EPA Jacket 85937-2 Vol.2

PROCESSING REQUEST

Reg # 85	937-2	Decision # 3	5215US)
Description:	Acceptable Ubl	Notif - Addition	n of AB	.N and
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	abel & Letter OPLS):	R Secretary	Electroni el & Lette ung required	1 100 (100 (100 (100 (100 (100 (100 (10
☐ Dated:	10/14/16	□ Dated	•	
	***Only one label ty	pe should be selected**	**	
Other Mat	erials Sent (see	jacket):		68 (1987-1008)
☐ New CSF(s)) Dated:			
Other:				
and clipped togeth materials to staff in jacket is full or onl	t and attached materia er, NOT STAPLED. The n the Information Servi y available as an image e (ISC). For further in	n give the jacket w ces Center (ISC) (F e, please file materi	ith the covers Room S-4900) als in a new ja	sheet and). If a acket and
Reviewer:	t.Reighart			
Division:	BPPD			
Phone:		Date:	10/14/	110



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

October 14, 2016

M. Sam Bondurant Consultant Plant Impact Plc c/o Bondurants Consulting LLC 2502 Cedar Ridge Drive Germantown, TN 38138

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 – Acceptable

Addition of Alternate Brand Name and Integration of Sublabels under Master Label Page

Product Name: Bug Oil Food Use EPA Registration Number: 85937-2 Application Date: September 16, 2016

OPP Decision Number: 521565

Dear Ms. Bondurant:

The U.S. Environmental Protection Agency (EPA) is in receipt of your application for notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Biopesticides and Pollution Prevention Division (BPPD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The labeling submitted with this application has been stamped "Notification" and will be placed in our records. The alternate brand name "Nerio" been added to the product's records. You must submit one (1) copy of the final printed labeling with the modifications.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and is subject to review by the EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Page 2 of 2 EPA Reg. No. 85937-2 OPP Decision No. 521565

If you have any questions, please contact Andrew Reighart of my team by phone at (703) 347-0469 or via email at reighart.andrew@epa.gov.

Sincerely,

Andrew Bryceland, Team Leader Biochemical Pesticides Branch Biopesticides and Pollution Prevention Division (7511P) Office of Pesticide Programs

Enclosure

Bug Oil Version #2 - Alternate Brand Name: Nerio 12 October 2016

[Bracketed information is optional text]

BUG OIL (EPA REG. NO. 85937-2)

MASTER LABEL

Sublabel A is for Commercial Use

Indoor and Outdoor Use as an insecticide/acaricide for the control of mites, whiteflies, aphids, mealybugs, scales and psylla on all food crops.

Sublabel B is for Residential Use

Indoor and Outdoor Use as an insecticide/acaricide for the control of mites, whiteflies, aphids, mealybugs, scales and psylla on all food crops

BUG OIL FOOD USE

For Indoor and Outdoor Use as an insecticide/
Acaricide for the control of mites, whiteflies, aphids, mealybugs, scales and
psylla [on all food crops].

ACTIVE INGREDIENTS:

Canola Oil	93.899%
Tagetes Oil	0.6%
Thyme Oil	0.6%
Wintergreen Oil	0.001%
OTHER INGREDIENTS	4.9%
TOTAL	100.000%

KEEP OUT OF REACH OF CHILDREN

NOTIFICATION

85937-2

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

10/14/2016

[Refer to [Back][Side][Other] Panel or Precautionary Statements]

Manufactured by:

Plant Impact pic

Rothamsted, West Common, Harpenden Hertfordshire, AL5 2JQ United Kingdom

EPA Reg. No. 85937-2 EPA Est. No. XXXXX-NET CONTENTS: 1 Gallon



Bug Oil Food Use Bug Oil Food Use Commercial [Sub-Label A]

For Indoor and Outdoor Use as an insecticide/acaricide for the control of mites, whiteflies, aphids, mealybugs, scales and psylla [on all food crops].

ACTIVE INGREDIENTS:

Canola Oil	93.899%
Tagetes Oil	0.6%
Thyme Oil	0.6%
Wintergreen Oil	0.001%
OTHER INGREDIENTS	4.9%
TOTAL	100.000%

KEEP OUT OF REACH OF CHILDREN

[Refer to [Back][Side][Other] panel or Precautionary Statements]

Manufactured by:
Plant Impact plc
Rothamsted, West Common, Harpenden
Hertfordshire, AL5 2JQ
United Kingdom

EPA Reg. No. 85937-2 EPA Est. No.

[] Denotes optional language

NET CONTENTS: X gallon(s) [X litre(s)]

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Prolonged or frequently repeated skin contact with the concentrated product may cause allergic reactions in some individuals.

ENVIRONMENTAL HAZARDS

For terrestrial uses: Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling.

For any requirements specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation [Read][all other safety precautions and directions for use][entire label][prior to use].

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Waterproof gloves

Follow manufacturer's instructions for cleaning/maintaining personal protective equipment (PPE). If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users should:

- · Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

AGRICULTURAL USE REQUIREMENTS

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

Use this product only in accordance with its label and with Worker Protection Standard (WPS), 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides.

It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment, notification to workers and restricted entry interval (REI). The requirements in this box apply to uses of this product that are covered by the Worker Protection Standard (WPS).

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 4 hours.

PPE required for early entry into restricted areas (that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water), is:

- Long-sleeved shirt and long pants
- · Shoes plus socks
- Waterproof gloves

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that area NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, and greenhouses.

· Keep children and pets off treated areas until dry.

Application Timing and Dose Rates

For all food crop plants and listed pests, apply Bug Oil at the rate of a 1% or 2% spray solution. See application instructions for more information. For a 1% spray solution, apply up to a maximum of 260 gallons of spray solution per acre (equivalent to no more than 2.6 gallons of Bug Oil per acre). For a 2% spray solution, apply up to a maximum of 260 gallons of spray solution per acre (equivalent to no more than 5.2 gallons of Bug Oil per acre). Apply as soon as pests appear on the plant. If required, repeat applications every 5-7 days to ensure that each new generation that appears is treated.

Mixing

Shake the container of Bug Oil thoroughly before opening.

For a 1% spray solution, mix 1.3 fluid ounces Bug Oil per gallon of water, equivalent to no more than 7.7 fluid ounces of Bug Oil per 1000 square feet, or 2.6 gallons of Bug Oil per acre. For a 2% spray solution, mix 2.6 fluid ounces of Bug Oil per gallon of water, equivalent to no more than 15.4 fluid ounces of Bug Oil per 1000 square feet, or 5.2 gallons of Bug Oil per acre.

Fill the spray tank with approximately half the required amount of water. Accurately measure the correct amount of Bug Oil and add to the spray tank, agitating the mixture continuously. Add the remainder of the water to the spray tank. Keep the solution agitated during spraying

and use immediately. Avoid leaving spray solution in the sprayer for long periods such as during meals and overnight.

FILL THE TANK HALF FULL THEN ADD PRODUCT IN THIS ORDER:

- 1. Dry flowables (DF)
- 2. Wettable powders (WP) and Wettable dry granules (WDG)
- 3. Flowables (F and SC)
- 4. Foliar fertilizers
- 5. Then any products containing oils of any kind including Emulsifiable Concentrates (EC)

Spray Application

Choose a nozzle that produces a fine spray quality and apply the product to give thorough coverage of the plant foliage, ensuring both the upper and lower surfaces of the leaves are covered. Do not spray more than required and ensure spray run-off is avoided. A minimum of 22 gallons of spray solution per acre should be applied.

[Cleaning Spray Equipment

Ensure all spray equipment is thoroughly cleaned after use. Use of water and detergent will be sufficient. Dispose of washings according to local regulations.]

[Crop Safety

Bug Oil has been tested on tomatoes and a range of plant species. However, before using Bug Oil on any new plant species or varieties, it is recommended that a small area is sprayed first to assess crop safety. Any mixtures with other products need to be tested prior to large scale use to ensure physical compatibility and crop safety.

Tomato crops can be sprayed when in flower but suitable precautions should be taken to minimize the risk of crop damage by spraying in the morning or evening when temperatures are lower.]

USE SITES

Bug Oil is used to control mites, whiteflies, aphids, thrips, mealybugs, scales and psylla [on all food crops]. [Please see Appendix I for all food crops.] [Some or all crops may be included on product label.] Bug Oil can be used on [insert specific crops from Appendix I].]

Pre-harvest Interval: This product can be applied up to and including the day of harvest.

Application Instructions

7,490	Instructions A	Naximum Single A	pplication Rate		
		pray Solution	2% Spray Solu		
Pest	fl. oz./ gallon of water	gallons Bug Oil/ Acre	fl. oz. / gallon of water	gallons Bug Oil/ Acre	Notes
Whiteflies Trialeurodes vaporariorum Bemisia tabaci Bemisia argentifolii	1.3	2.6	2.6	5.2	Apply 1% spray solution at the onset of the pest entering the crop. Increase the rate to 2% spray solution under conditions of high pest pressure or in indoor crops when multiplication of the pest is rapid.
Mites Tetranychus spp. Panonychus spp.	1.3	2.6	N/A	N/A	
Aphids Aphis gossypii Myzus persicae Aphis spp.	1.3	2.6	2.6	5.2	Apply 1% spray solution at the onset of the pest entering the crop. Increase the rate to 2% spray solution under conditions of high pest pressure or in indoor crops when multiplication of the pest is rapid.
Thrips Fraklinellia spp.	N/A	N/A	2.6	5.2	
Mealybugs	1.3	2.6	N/A	N/A	
Scales	1.3	2.6	N/A	N/A	
Psylla spp.	1.3	2.6	N/A	N/A	

Apply no more than 260 gallons of water per acre. Apply to ensure thorough coverage of plants and pests. A minimum rate of 22 gallons per acre is recommended.

Resistance: The mode of action includes a physical element and resistance is less likely to arise with Bug Oil than pesticides relying on chemical effects along.

[COMPATIBILITY

Bug Oil may be tank-mixed with a variety of plant protection products and foliar nutrient sprays providing that the application timing is correct for both Bug Oil and the partner(s) in the mixture.

The products should be added separately to the bulk of water in the spray tank. Continuous agitation should be maintained and the product used immediately after mixing.

For further information on the approval status of mixture partners, consult Plant Impact.

If a tank-mix with another product is required, add the Bug Oil to the spray tank first and ensure that it is fully dispersed before adding subsequent products. PLEASE SEE THE MIXING SCHEDULE ABOVE.

Ensure that the label recommendations are followed for the partner product.]

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

PESTICIDE STORAGE

Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed.

Store in original container and out of the reach of children, preferably in a locked storage area.

PESTICIDE DISPOSAL

Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING

Non-refillable container. Do not reuse or refill this container.

Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[NOTICE TO BUYER]

[Note: Plant Impact warrants that this product complies with the specifications expressed in this label. To the extent consistent with applicable law, Plant Impact makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, Plant Impact's liability or default, breach or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Plant Impact shall have no liability for consequential damages.]

[Warranty and Disclaimer Statement]

[The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Such risks may arise from weather conditions, soil factors, off-target movement, unconventional farming techniques, the presence of other materials, the manner of use or application, or other unknown factors, all of which are beyond the control of Plant Impact, and can cause crop injury, injury to non-target crops or plants, ineffectiveness of the product, or other unintended consequences. To the extent consistent with applicable law, all such risks shall be assumed by the user or buyer.

Plant Impact warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal

conditions. This warranty does not extend to the use of this product contrary to label instructions or under conditions not reasonably foreseeable to Plant Impact, and is subject to the inherent risks described above.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, PLANT IMPACT DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING WARRANTY ANY MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, PLANT IMPACT, MANUFACTURER, AND SELLER DISCLAIM AND SHALL NOT BE LIABLE FOR ANY SPECIAL, INCIDENTAL, INDIRECT, OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE, HANDLING, APPLICATION, STORAGE, OR DISPOSAL OF THIS PRODUCT OR FOR DAMAGES IN THE NATURE OF PENALTIES, AND THE USER AND BUYER WAIVE ANY RIGHT THAT THEYT MAY HAVE TO SUCH DAMAGES. NO AGENT, REPRESENTATIVE OR EMPLOYEE OF PLANT IMPACT IS AUTHORIZED TO MAKE ANY WARRANTY, GUARANTEE OR REPRESENTATION BEYOND THOSE CONTAINED HEREIN OR TO MODIFY THE WARRANTIES CONTAINED HEREIN, TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE TOTAL LIABILITY OF PLANT IMPACT, MANUFACTURER, AND SELLER, SHALL BE LIMITED TO THE PURCHASE PRICE PAID, OR AT PLANT IMPACT'S ELECTION, THE REPLACEMENT OF THE PRODUCT.1

Manufactured by:

Plant Impact plc Rothamsted, West Common, Harpenden Hertfordshire, AL5 2JQ United Kingdom Tel. +44 (0) 1582 465540

[Batch Code]

[Some or all crops from Appendix I may be listed on the final marketed product label.]

APPENDIX I

COTTON

ROOT AND TUBER VEGETABLES - CROP GROUP 1

Arracacha (Arracacia xanthorrhiza)

Arrowroot (Maranta arundinacea)

Artichoke, Chinese (Stachys affinis)

Artichoke, Jerusalem (Helianthus tuberosus)

Beet, garden (Beta vulgaris)

Beet, sugar (Beta vulgaris)

Burdock, edible (Arctium lappa)

Canna, e4dible (Queensland arrowroot) (Canna indica)

Carrot (Daucus carota)

Cassava, bitter and sweet (Manihot esculenta)

Celeriac (celery root) (Apium graveolens var. rapaceum)

Chayote (root) (Sechium edule)

Chervil, turnip-routed (Chaerophyllum bulbosum)

Chicory (Cichorium intybus)

Chufa (Cyperus esculentus)

Dasheen (taro) (Colocasia esculenta)

Ginger (Zingiber officinale)

Ginseng (Panax quinquefolius)

Horseradish (Armoracia rusticana)

Leren (Calathea allouia)

Parsley, turnip-rooted (Petroselinum crispum var. tuberosum)

Parsnip (Pastinaca sativa)

Potato (Solanum tuberosum)

Radish, oriental (daikon) (Raphanus sativus subvar. Longipinnatus)

Rutabaga (Brassica campestris var. napobrassica)

Salsify (oyster plant) (Tragopogon porrifolius)

Salsify, black (Scorzonera hispanica)

Salsify, Spanish (Scolymus hispanicus)

Skirret (Sium sisarum)

Sweet potato (ipomoea batatas)

Tanier (cocoyam) (Xanthosoma sagittifolium)

Turmeric (Curcuma longa)

Turnip (Brassica rapa var. rapa)

Yam bean (jícama, manoic pea) (Pachyrhizus spp.)

Yam, true (Dioscorea spp.)

LEAVES OF ROOT AND TUBER VEGETABLES (HUMAN FOOD OR ANIMAL FEED) GROUP - COMMODITIES - CROP GROUP 2

Beet, garden (Beta vulgaris)

Beet, sugar (Beta vulgaris)

Burdock, edible (Arctium lappa)

Carrot (Daucus carota)

Cassava, bitter and sweet (Manihot esculenta)

Celeriac (celery root) (Apium graveolens var. rapaceum)

Chervil, turnip rooted (Chaerophyllum bulbosum)

Chicory (Cichorium intybus)

Dasheen (taro) (Colocasia esculenta)

Parsnip (Pastinaca sativa)

Radish (Raphanus sativus)

Radish, oriental (daikon) (Raphanus sativus subvar. longipinnatus)

Rutabaga (Brassica campestris var. napobrassica)

Salsify, black (Scorzonera hispanica)

Sweet potato (ipomoea batatas)

Tanier (cocoyam) (Xanthosoma sagittifolium)

Turnip (Brassica rapa var. rapa)

Yam, true (Dioscorea spp.)

BULB VEGETABLES (Alliums spp.) GROUP - COMMODITIES - CROP GROUP 3

Chive, fresh leaves (Allium schoenoprasum L.)

Chive, Chinese, fresh leaves (Allium tuberosum Rottier ex Spreng)

Davlily, bulb (Hemerocallis fulva (L.) L. var. futva)

Elegans hosta (Hosta Sieboldiana (Hook) Engl)

Fritillaria, bulb (Fritillaria L. fritillary)

Garlic, bulb (Allium sativum L. var. sativum) (A. sativum Common Garlic Group)

Garlic, great headed, bulb (Allium ampeloprasum L. var. ampeloprasum) (A. ampeloprasum

Great Headed Garlic Group)

Garlic, Serpent, bulb (Allium sativum var. ophioscorodon or A. sativum Ophioscorodon Group)

Kurrat (Allium kurrat Schweinf. Ex. K. Krause or A. ampeloprasum Kurrat Group)

Lady's leek (Allium cemuum Roth)

Leek (Allium porrum L. (syn: A. ampeloprasum L. var. porrum (L.) J. Gay) (A. ampeloprasum Leek Group)

Leek, wild (Allium tricoccum Aiton)

Lily, bulb (Lilium spp. (Lilium Leichtlinil var. maximowiczil, Lilium lancifolium))

Onion, Beltsville bunching (Allium x proliferum (Moench) Schrad.) (syn: Allium fistolosum L. x A. cepa L.)

Onion, bulb (Allium cepa L. var. cepa) (A. cepa Common Onion Group)

Onion, Chinese, bulb (Allium chinense G. Don.) (syn: A. bakeri Regel)

Onion, fresh (Allium fistolosum L. var. caespitosum Makino)

Onion, green (Allium cepa L. var. cepa) (A. cepa Common Onion Group)

Onion, macrostem (Allium macrostemom Bunge)

Onion, pearl (Allium pomom var. sectivum or A. ampeloprasum Pearl Onion Group)

Onion, potato, bulb (Allium cepa L. var. aggregatum G. Don.) (A. cepa Aggregatum Group)

Onion, tree, tops (Allium x proliferum (Moench) Schrad. Ex Wild.) (syn: A. cepa var. proliferum (Moench) Regel. A. cepa L. var. bulbiferum L.H. Bailey, A. cepa L. var. Viviparm (Metz) Alef.)

Onion, Welsh, tops (Allium fistolosum L.)

Shallot, fresh leaves (Allium cepa var. aggregatum G.Don.)

Cultivars, varieties, and/or hybrids of these.

LEAFY VEGETABLES (EXCEPT BRASSICA VEGETABLES) GROUP - CROP GROUP 4

Amaranth (leafy amaranth, Chinese Spinach, tampaia) (Amaranthus spp.)

Arugula (Roquette) (Eruca sativa)

Cardoon (Cynara cardunculus)

Celery (Apium graveolens var. dulce)

Celery, Chinese (Apium graveolens var. secalinum)

Celtuce (Lactuca sativa var. Angustana)

Chervil (Anthriscus cerefolium)

Chrysanthemum, edible-leaved (Chrysanthemum coronarium var. coronarium)

Chrysanthemum, garland (Chrysanthemum coronarium var. spaliosum)

Corn salad (Valerianella locusta)

Cress, garden (Lepidium sativum)

Cress, upland (yellow rocket, winter cress) (Barbarea vulgaris)

Dandelion (Taraxacum officinale)

Dock (sorrel) (Rumex spp.)

Endive (escarole) (Cichorium endivia)

Fennel, Florence (finachio) (Foeniculum vulgare Azoricum Group)

Lettuce, head and leaf (Lactuca sativa)

Orach (Atriplex hortensis)

Parsley (Petroselinum crispum)

Purslane, garden (Portulaca oleracea)

Purslane, Winter (Montia perfoliata)

Radicchio (red chicory) (Cichorium intybus)

Rhubarb (Rheum rhabarbarum)

Spinach (Spinacia oleracea)

Spinach, New Zealand (Tetragonia tetragonioides, T. Expansa)

Spinach, vine (Malabar spinach, Indian spinach) (Baselia alba)

Swiss chard (Beta vulgaris var. cicla)

BRASSOCA (COLE) LEAFY VEGETABLES - CROP GROUP 5

Broccoli (Brassica oleracea var. botrytis)

Broccoli, Chinese (gai lon) (Brassica alboglabra)

Broccoli raab (rapini) (Brassica campestria)

Brussel sprouts (Brassica oleracea var. gemmifera)

Cabbage (Brassica oleracea)

Cabbage, Chinese (bok choy) (Brassica chinensis)

Cabbage, Chinese (napa) (Brassica pekinensis)

Cabbage, Chinese mustard (gai choy) (Brassica campestris)

Cauliflower (Brassica oleracea var. botrytis)

Cavalo broccolo (Brassica oleracea var. Botrytis)

Collards (Brassica oleracea var. acephala)

Kale (Brassica oleracea var. Acephala)

Kohlrabi (Brassica oleracea var. gongylodes)

Mizuna (Brassica rapa Japonica Group)

Mustard greens (Brassica juncea)

Mustard spinach (Brassica rapa Perviridis Group)

Rape greens (Brassica napus)

LEGUME VEGETABLES (SUCCULENT OR DRIED) - CROP GROUP 6

Bean (Lupinus spp.) (includes grain lupin, sweet lupin, white lupin, and white sweet lupin) Bean (Phaseolus spp.) (includes field bean, kidney bean, lima bean, navy bean, pinto bean, runner bean, snap bean, tepary bean, wax bean)

Bean (Vigna spp.) (includes adzuki bean, asparagus bean, blackeyed pea, catjang, Chinese longbean, cowpea, Crowder pea, moth bean, mung bean, rice bean, southern pea, urd bean, yardlong bean)

Broad bean (fava bean) (Vicia faba)

Chickpea (garbanzo bean) (Cicer arietinum)

Guar (Cyamopsis tetragonoloba)

Jackbean (Canavalia ensiformis)

Labfab bean (hyacinth bean) (Lablab purpureus)

Lentil (Lena esculenta)

Pea (Pisum spp.) (includes dwarf pea, edible-pod pea, English pea, field pea, garden pea,

Green pea, snow pea, sugar snap pea)

Pigeon pea (Cajanus cajan)

Soybean (Glycine max)

Soybean (immature seed) (Glycine max)

Sword bean (Canavalia gladiate)

FOLIAGE OF LEGUME VEGETABLE GROUP - CROP GROUP 7

Any cultivar of bean (Phaseolus spp.) and field pea (Pisum spp.) and soybean (Glycine max)

FRUITING VEGETABLES (EXCEPT CUCURBITS) - COMMODITIES - CROP GROUP 8

Eggplant (Bolanum melongena)

Groundcherry (Physalis spp.)

Pepino (Solanum muricatum)

Pepper (Capsicum spp.) (includes bell pepper, chili pepper, cooking pepper, pimento, sweet pepper)

Tomatillo (Physalis ixocarpa)

Tomato (Lycopersicon esculentum)

CUCURBIT VEGETABLES - CROP GROUP 9

Chayote (fruit) (Sechium edule)

Chinese waxgourd (Chinese preserving melon) (Benincasa hispida)

Citron melon (Citrullus ianatus var. citroides)

Cucumber (Cucumis sativus)

Gherkin (Cucumis anguna)

Gourd, edible (Lagenaria spp.) (Includes hyotan, cuczza); (Luffa acutangula, L. cylindrica) (includes hechima, Chinese okra)

Momordica spp. (includes balsam Apple, balsam pear, bitter melon, Chinese Cucumber)

Muskmelon (hybrids and/or cultivars of Cucumis melo) (includes true cantaloupe, casaba, Crenshaw melon, golden pershaw melon, honeydew melon, honey balls, mango melon, Persian melon, pineapple melon, Santa Claus melon and snake melon)

Pumpkin (Curcubita spp.)

Squash, summer (Cucurbita pepo var. melopepo) (includes crookneck squash, scallop squash, straightneck squash, vegetable marrow, zucchini)

Squash, winter (Cucurbita maxima; C. moschata) (includes butternut squash, Calabaza, Hubbard squash); (C. mixta; C. pepo) (includes acorn squash, spaghetti squash)

Watermelon (includes hybrids and/or varieties of Citrullus lanatus)

CITRUS FRUITS (CITRUS spp., FORTUNELLA spp.) GROUP - COMMODITIES - CROP GROUP 10

Calamondin (Citrus milis x Citrofortunella mitis)

Citrus citron (Citrus medica)

Citrus hybrids (Citrus spp.) (includes chironja, tangelo, tangor)

Grapefruit (Citrus paradisi)

Kumquat (Fortunella spp.)

Lemon (Citrus jambhiri, Citrus limon)

Lime (Citrus aurantiifolia) Mandarin (tangerine) (Citrus reticulata) Orange, sour (Citrus aurantium) Orange, sweet (Citrus ainensis) Pummelo (Citrus grandis, Citrus maxima) Satsuma mandarin (Citrus unshiu)

POME FRUITS GROUP - COMMODITIES - CROP GROUP 11

Apple (Malus domestica) Crabapple (Malus spp.) Loquat (Eriobotrya japonica) Mayhaw (Crataegus aestivalis, C. opaca. And C. rufula) Pear (Pyrus communis) Pear, oriental (Pyrus pyrifolia) Quince (Cydonia oblonga)

STONE FRUITS GROUP - COMMODITIES - CROP GROUP 12

Apricot (Prunus amemiaca) Cherry, sweet (Prunus avium) Cherry, tart (Prunus cerasus) Nectarine (Prunus persica) Peach (Prunus persica) Plum (Prunus domestice, Prunus spp.) Plum, Chickasaw (Prunus angustifolia) Plum, Damson (Prunus domestica spp. Insititia) Plum, Japanese (Prunus salicina) Plumcot (Prunus ameniaca × P. domestica) Prune (fresh) (Prunus domestica, Prunus spp.)

BERRIES GROUP - CROP GROUP 13

Blackberry (Rubus eubatus) (including bingleberry, black satin berry, boysenberry, Cherokee blackberry, Chesterberry, Cheyenne blackberry, coryberry, darrowberry, dewberry, Dirksen thornless berry, Himalayaberry, hullberry, Lavacaberry, lowberry, Lucretiaberry, mammouth blackberry, marionberry, nectarberry, ciallieberry, Oregon evergreen phenomenalberry, rangeberry, ravenberry, rossberry, Shawnee blackberry, youngberry, and varieties and/or hybrids of these)

Blueberry (Vaccinium spp.)

Currant (Ribes spp.)

Elderberry (Sambucus spp.)

Gooseberry (Ribes spp.)

Huckleberry (Gaylussacia spp.)

Loganberry (Rubus loganobaccus)

Raspberry, black and red (Rubus occidentalis, Rubus strigosus, Rubus idaeus)

BERRY AND SMALL FRUIT CROP GROUP - CROP GROUP 14

Amur river grape (Vitis amurensis Rupr) Aronia berry (Aronia spp.) Bayberry (Myrica spp.) Bearberry (Arctostaphylos uva-ursi) Bilberry (Vaccinium myrtillus L.)

Blackberry (Rubus spp.) (including Andean blackberry, arctic blackberry, bingleberry, black satin berry, boysenberry, brombeere, California blackberry, Chesterberry, Cherokee blackberry, Cheyenne blackberry, common blackberry, coryberry, darrowberry, dewberry, Dirksen thornless berry, evergreen blackberry, Himalayaberry, hullberry, Lavacaberry, loganberry, lowberry, Lucretiaberry, mammoth blackberry, marionberry, mora, mures Northern dewberry, olallieberry, Oregon evergreen berry, deronce, nectarberry, phenomenalberry, rangeberry, ravenberry, rossberry, Shawnee dewberry, tayberry, youngberry, zarzamora and cultivars, varieties and/or hybrids of these.)

Blueberry, highbush (Vaccinium spp.)

Blueberry, lowbush (Vaccinium angustifolium Aiton)

Buffalo currant (Ribes aureum Pursh)

Buffaloberry (Shepherdia argentea (Pursh) Nutt.)

Che (Cudrania tricuspidata Bur. Ex Lavallee)

Chilean guava (Myrtus ugni Mol.)

Chokecherry (Prunus virginiana L.)

Cloudberry (Rubus chamaemorus L.)

Cranberry (Vaccinium macrocarpon Aiton)

Currant, black (Ribes nigrum L.)

Currant, red (Ribes rubrum L.)

Elderberry (Sambucus spp.)

European barberry (Berberia vulgaris L.)

Gooseberry (Ribes spp.)

Grape (Vitis spp.)

Highbush cranberry (Viburnum opulus L. var. Americanum Aiton)

Honeysuckle, edible (Lonicera caerula L. var. emphyllocalyx Nakai, Lonicera caerula L. var.

edulis Turcz. Ex herder)

Huckleberry (Gaylussacia spp.)

Jostaberry (Ribes × nidigrolaria Rud. Bauer and A. Bauer)

Juneberry (Saskatoon berry) (Amelanchier spp.)

Kiwifruit, fuzzy (Actinidia deliciosa A. Chev.) (C.F. Liang and A.R. Fergusons, Actinida chinensis Planch)

Kiwifruit, hardy (Actinidia argula (Siebold and Zucc.) Planch ex Miq)

Lingonberry (Vaccinium vitis-idaea L.)

Maypop (Passiflora incarnate L.)

Mountain pepper berries (Tasmannia lanceolate) (Poir.) A.C. Sm.

Mulberry (Morus spp.)

Muntries (Kunzea pornifera F. Muell)

Native currant (Acrotriche depressa R.BR.)

Partridgeberry (Mitchella repens L.)

Phalsa (Grewia subinaequalis DC)

Pinchberry (Prunus pensylvanica L.f.)

Raspberry, black and red (Rubus spp.)

Riberry (Syzygium luehmannii)

Salal (Gaultheria shallon Pursh)

Schisandra berry (Schisandra chinensis (Turcz.) Baill.)

Sea buckthorn (Hippophae rhamnoides L.)

Serviceberry (Sorbus spp.)

Strawberry (Fragaria × ananassa Duchesne)

Wild raspberry (Rubus muelleri Lefevre ex P.J. Mull)

Cultivars, varieties and/or hybrids of these.

TREE NUTS - COMMODITIES - CROP GROUP 14

Almond (Prunus dulcis)

Beech nut (Fagus spp.)

Brazil nut (Bertholletia excelsa)

Butternut (Juglans cineree)

Cashew (Anacardium occidentale)

Chestnut (Castanea spp.)

Chinquapin (Castanea pumila)

Filbert (hazelnut) (Corylus spp.)

Hickory nut (Carya spp.)

Macadamia nut (bush nut) (Macadamia spp.)

Pecan (Carya illinoensis)

Walnut, black and English (Persian) (Juglans spp.)

CEREAL GRAINS - COMMODITIES - CROP GROUP 15

Barley (Hordeum spp.)

Buckwheat (Fagopyrum esculentum)

Corn (Zea mays)

Millet, pearl (Pennisetum glaucum)

Millet, proso (Panicum millaceum)

Oats (Avena spp.)

Popcorn (Zea mays var. everta)

Rice (Oryza sativa)

Rye (Secale cereale)

Sorghum (milo) (Sorghum spp.)

Teosinte (Euchlaena mexicana)

Triticale (Triticum-Secale hybrids)

Wheat (Triticum spp.)

Wild rice (Zizania aquatica)

FORAGE, FODDER AND STRAW OF CEREAL GRAINS GROUP - CROP GROUP 16

Forage, fodder, and straw of all commodities included in the group cereal grains group

GRASS FORAGE, FODDER, AND HAY GROUP - CROP GROUP 17

Any grass, Gramineae family (either green or cured) except sugarcane and those included in the cereal grains group, that will be fed or grazed by livestock, all pasture and range grasses and grasses grown for hay or silage.

NONGRASS ANIMAL FEEDS (FORAGE, FODDER, STRAW, AND HAY) GROUP - CROP GROUP 18

Alfalfa (Medicago sativa subsp. sativa)

Bean, velvet (Mucuna pruniens var. utilis)

Clover (Trifolium spp., Melilotus spp.)

Kudzu (Puerana lobata)

Lespedeza (Lespedeza spp.)

Lupin (Lupinus spp.)

Sainfoin (Onobrychis vicifolia)

Trefoil (Lotus spp.)

Vetch (Vicia spp.)

Vetch, Crown (Coronilla vania)

Vetch, milk (Astragalus spp.)

HERBS AND SPICES GROP - CROP GROUP 19

Allspice (Pimenta dioica)

Angelica (Angelica archangelica)

Anise, (anise seed) (Pimpinella anisum)

Anise, star (Illicium verum)

Annatto (seed) (Bixaceae spp.)

Balm (lemon balm) (Melissa officinalis)

Basil (Ocimum basilicum)

Borage (Borago officinalis)

Burnet (Sanguisorba minor)

Camomile (Anthemis nobilis)

Caper bulbs (Cappanis spinosa)

Caraway (Carum carvi)

Caraway, black (Nigella sativa)

Cardamom (Elettaria cardamomum)

Cassia bark (Cinnamomum aromaticum)

Cassia buds (Cinnamomum aromaticum)

Catnip (Nepeta cataria)

Celery seed (Apicum graveolens)

Chervil (dried) (Anthriacus cerefolium)

Chive (Allium schoenoprasum)

Chive, Chinese (Aillium tuberosum)

Cinnamon (Cinnamomum verum)

Clary (Salvia sclarea)

Clove buds (Eugenia caryophyllata)

Coriander (cilantro or Chinese parsley) (leaf) (Coriandrum sativum)

Coriander (cilantro) (seed) Coriandrum sativum)

Costmary (Chrysanthemum balsamita)

Culantro (leaf) (Eryngium foetidum)

Culantro (seed) (Eryngium foetidum)

Cumin (Cuminum cyminum)

Curry (leaf) (Murraya koenigii)

Dill (dillweed) (Anethum graveolens)

Dill (seed) (Anethum graveolens)

Fennel (common) (Foeniculum vulgare)

Fennel, Florence (seed) (Foeniculum vulgare Azoricum Group)

Fenugreek (Trigonella foenumigraecum)

Grains of paradise (Aframomum melegueta)

Horehound (Marrubium vulgare)

Hyssop (Hyssopus officinalis)

Juniper berry (Juniperus communis)

Lavender (Lavandula officinalis)

Lemongrass (Cymbopogon citratus)

Lovage (leaf) (Levisticum officinale)

Lovage (seed) (Levisticum officinale)

Mace (Myristica fragrans)

Marigold (Calendula officinalis)

Marjoram (Origanum spp.) (includes sweet or annual marjoram, wild marjoram or oregano, and pot marjoram)

Mustard (seed) (Brassica juncea, B. hirta, B. nigra)

Nasturtium (Tropaeolum majus)

Nutmeg (Myristica fragrans)

Parsley (dried) (Petroselinum crispum)

Pennyroyal (Mentha pulegium)

Pepper, black (Piper nigrum)

Pepper, white

Poppy (seed) (Papaver somniferum)

Rosemary (Rosemarinus officinalis)

Rue (Ruta graveolens)

Saffron (Crocus sativus)

Sage (Salvia officinalis)

Savory, summer and winter (Satureja spp.)

Sweet bay (bay leaf) (Laurus nobilis)

Tansy (Tanacetum vulgare)

Tarragon (Artemisia dracunculus)

Thyme (Thymus spp.)

Vanilla (Vanilla planifolia)

Wintergreen (Gaultheria procumbens)

Woodruff (Galium odorata)

Wormwood (Artemisia absinthium)

EDIBLE FUNGI GROUP - COMMODITIES - CROP GROUP 21

Blewitt (Lepista nuda)

Bunashimeji (Hypsizygus marmmoreus)

Chinese mushroom (Volvariella volvacea) (Bull.) Singer

Enoki (Fiammulina velutipes) (Curt.) Singer

Hime-Matsutake (Agaricus blazei) Murill

Hirmeola (Auricularia auricular)

Maitake (Grifola frondosa)

Morel (Morchella spp.)

Nameko (Pholiota nameko)

Net Bearing (Dictyophora)

Oyster mushroom (Pleurotus spp.)

Pom Pom (Hericium erinaceus)

Reishi mushroom (Ganoderma lucidum (Leyss. Fr.) Karst.)

Rodman's Agaricus (Agaricus bitorquis) (Quel.) Saccardo

Shitake mushroom (Lentinula edodes (Berk.) Pegl.)

Shimeji (Tricholoma conglobatum)

Stropharia (Stropharia spp.)

Truffle (Tuber spp.)

White button mushroom (Agaricus bisporous (Lange) Imbach)

White Jelly Fungi (Tremella fuciformis)



Bug Oil Food Use Bug Oil Food Use Residential [Sub-Label B]

For indoor and Outdoor Use as an insecticide/acaricide for the control of mites, whiteflies, aphids, mealybugs, scales and psylla [on all food crops].

ACTIVE INGREDIENTS:

Canola Oil	93.8 99 %
Tagetes Oil	0.6%
Thyme Oil	0.6%
Wintergreen Oil	0.001%
OTHER INGREDIENTS	4. 9 %
TOTAL	100.000%

KEEP OUT OF REACH OF CHILDREN

[Refer to [Back][Side][Other] panel or Precautionary Statements]

Manufactured by:
Plant impact plc
Rothamsted, West Common, Harpenden
Hertfordshire, AL5 2JQ
United Kingdom

EPA Reg. No. 85937-2 EPA Est. No.

[] Denotes optional language

NET CONTENTS: X gallon(s) [X litre(s)]

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Prolonged or frequently repeated skin contact with the concentrated product may cause allergic reactions in some individuals.

ENVIRONMENTAL HAZARDS

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling.

For any requirements specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation [Read] [all other safety precautions and directions for use][entire label][prior to use].

Application Timing and Dose Rates

For all food crop plants and listed pests, apply Bug Oil at the rate of 1% or 2% spray solution. See application instructions for more information.

For a 1% spray solution, mix 1.3 fluid ounces of Bug Oil per gallon of water, equivalent to no more than 7.7 fluid ounces of Bug Oil per 1000 square feet, or 2.6 gallons of-Bug Oil per acre. For a 2% spray solution, mix 2.6 fluid ounces of Bug Oil per gallon of water, equivalent to no more than 15.4 fluid ounces of Bug Oil per 1000 square feet, or 5.2 gallons of Bug Oil per acre.

Apply as soon as pests appear in the plant. If required repeat applications every 5-7 days to ensure that each new generation that appears is treated.

Mixing

Shake the container of Bug Oil thoroughly before opening. Fill the spray tank with approximately half the required amount of water.

Accurately measure the correct amount of Bug Oil and add this to the spray tank, agitating the mixture continuously. Add the remainder of the water to the tank to make up a 1% spray solution, 1.3 fluid ounces of Bug Oil per gallon water (equivalent to no more than 7.7 fluid ounces of Bug Oil per 1000 square feet) or a 2% spray solution, 2.6 fluid ounces of Bug Oil per gallon water (equivalent to no more than 15.4 fluid ounces of Bug Oil per 1000 square feet). Keep the solution agitated during spraying and use immediately. Avoid leaving spray liquid in the sprayer for longer periods such as during meal times and overnight.

FILL THE TANK HALF FULL THEN ADD PRODUCT IN THIS ORDER:

- 1. Dry flowables (DF)
- 2. Wettable powders (WP) and Wettable dry granules (WDG)
- 3. Flowables (F and SC)
- 4. Foliar fertilizers
- 5. Then any products containing oils of any kind including Emulsifiable Concentrates (EC)

[Cleaning Spray Equipment

Ensure all spray equipment is thoroughly cleaned after use. Use of water and detergent will be sufficient. Dispose of washings according to local regulations.]

[Crop Safety

Bug Oil has been tested on tomatoes and a range of plant species. However, before using Bug Oil on any new plant species or varieties, it is recommended that a small area is sprayed first to assess crop safety. Any mixtures with other products need to be tested prior to large scale use to ensure physical compatibility and crop safety.

Tomato crops can be sprayed when in flower but suitable precautions should be taken to minimize the risk of crop damage by spraying in the morning or evening when temperatures are lower.]

USE SITES

Bug Oil is used to control mites, whiteflies, aphids, thrips, mealybugs, scales and psylla [on all food crops]. [Please see Appendix I for all food crops.] [Some or all crops may be included on product label.] Bug Oil can be used on [insert specific crops from Appendix I].]

Pre-harvest Interval: This product can be applied up to and including the day of harvest.

Application Instructions

	٨	Maximum Single A	pplication Rate		
		pray Solution	2% Spray Solu	ıtion	
Pest	fl. oz./ gallon of water	gallons Bug Oil / Acre	fl. oz. / gallon of water	gallons Bug Oil / Acre	Notes
Whiteflies Trialeurodes vaporariorum Bemisia tabaci Bemisia argentifolii	1.3	2.6	2.6	5.2	Apply 1% spray solution at the onset of the pest entering the crop. Increase the rate to 2% spray solution under conditions of high pest pressure or in indoor crops when multiplication of the pest is rapid.
Mites Tetranychus spp. Panonychus spp.	1.3	2.6	N/A	N/A	
Aphids Aphis gossypii Myzus persicae Aphis spp.	1.3	2.6	2.6	5.2	Apply 1% spray solution at the onset of the pest entering the crop. Increase the rate to 2% spray solution under conditions of high pest pressure or in indoor crops when multiplication of the pest is rapid.
Thrips Fraklinellia spp.	N/A	N/A	2.6	5.2	
Mealybugs	1.3	2.6	N/A	N/A	
Scales	1.3	2.6	N/A	N/A	
Psylla spp.	1.3	2.6	N/A	N/A	

Apply to ensure thorough coverage of plants and pests.

Resistance: The mode of action includes a physical element and resistance is less likely to arise with Bug Oil than pesticides relying on chemical effects alone.

[COMPATIBILITY

Bug Oil may be tank-mixed with a variety of plant protection products and foliar nutrient sprays providing that the application timing is correct for both Bug Oil and the partner(s) in the mixture.

The products should be added separately to the bulk of water in the spray tank. Continuous agitation should be maintained and the product used immediately after mixing.

For further information on the approval status of mixture partners, consult Plant Impact.

If a tank-mix with another product is required, add the Bug Oil to the spray tank first and ensure that it is fully dispersed before adding subsequent products. PLEASE SEE THE MIXING SCHEDULE ABOVE.

Ensure that the label recommendations are followed for the partner product.]

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal.

PESTICIDE STORAGE

Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed.

Store in original container and out of the reach of children, preferably in a locked storage area.

PESTICIDE DISPOSAL

Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING

Non-refillable container. Do not reuse or refill this container.

If empty: Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

INOTICE TO BUYER1

[Note: Plant Impact warrants that this product complies with the specifications expressed in this label. To the extent consistent with applicable law, Plant Impact makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, Plant Impact's liability or default, breach or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Plant Impact shall have no liability for consequential damages.]

[Warranty and Disclaimer Statement]

[The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Such risks may arise from weather conditions, soil factors, off-target movement, unconventional farming techniques, the presence of other materials, the manner of use or application, or other unknown factors, all of which are beyond the control of Plant Impact, and can cause crop injury, injury to non-target crops or plants, ineffectiveness of the product, or other unintended consequences. To the extent consistent with applicable law, all such risks shall be assumed by the user or buyer.

Plant Impact warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. This warranty does not extend to the use of this product contrary to label instructions or under conditions not reasonably foreseeable to Plant Impact, and is subject to the inherent risks described above.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, PLANT IMPACT DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, PLANT IMPACT, MANUFACTURER, AND SELLER DISCLAIM AND SHALL NOT BE LIABLE FOR ANY SPECIAL, INCIDENTAL, INDIRECT, OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE, HANDLING, APPLICATION, STORAGE, OR DISPOSAL OF THIS PRODUCT OR FOR DAMAGES IN THE NATURE OF PENALTIES, AND THE USER AND BUYER WAIVE ANY RIGHT THAT THEYT MAY HAVE TO SUCH DAMAGES. NO AGENT, REPRESENTATIVE OR EMPLOYEE OF PLANT IMPACT IS AUTHORIZED TO MAKE ANY WARRANTY, GUARANTEE OR REPRESENTATION BEYOND THOSE CONTAINED HEREIN OR TO MODIFY THE WARRANTIES CONTAINED HEREIN, TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE TOTAL LIABILITY OF PLANT IMPACT, MANUFACTURER, AND SELLER, SHALL BE LIMITED TO THE PURCHASE PRICE PAID, OR AT PLANT IMPACT'S ELECTION, THE REPLACEMENT OF THE PRODUCT.]

Manufactured by:

Plant Impact plc Rothamsted, West Common, Harpenden Hertfordshire, AL5 2JQ United Kingdom Tel. +44 (0) 1582 465540

[Batch Code]

APPENDIX I

COTTON

ROOT AND TUBER VEGETABLES - CROP GROUP 1

Arracacha (Arracacia xanthorrhiza)

Arrowroot (Maranta arundinacea)

Artichoke, Chinese (Stachys affinis)

Artichoke, Jerusalem (Helianthus tuberosus)

Beet, garden (Beta vulgaris)

Beet, sugar (Beta vulgaris)

Burdock, edible (Arctium lappa)

Canna, e4dible (Queensland arrowroot) (Canna indica)

Carrot (Daucus carota)

Cassava, bitter and sweet (Manihot esculenta)

Celeriac (celery root) (Apium graveolens var. rapaceum)

Chayote (root) (Sechium edule)

Chervil, turnip-routed (Chaerophyllum bulbosum)

Chicory (Cichorium intybus)

Chufa (Cyperus esculentus)

Dasheen (taro) (Colocasia esculenta)

Ginger (Zingiber officinale)

Ginseng (Panax quinquefolius)

Horseradish (Armoracia rusticana)

Leren (Calathea allouia)

Parsley, turnip-rooted (Petroselinum crispum var. tuberosum)

Parsnip (Pastinaca sativa)

Potato (Solanum tuberosum)

Radish, oriental (daikon) (Raphanus sativus subvar. Longipinnatus)

Rutabaga (Brassica campestris var. napobrassica)

Salsify (oyster plant) (Tragopogon porrifolius)

Salsify, black (Scorzonera hispanica)

Salsify, Spanish (Scolymus hispanicus)

Skirret (Sium sisarum)

Sweet potato (ipomoea batatas)

Tanier (cocoyam) (Xanthosoma sagittifolium)

Turmeric (Curcuma longa)

Turnip (Brassica rapa var. rapa)

Yam bean (jicama, manoic pea) (Pachyrhizus spp.)

Yam, true (Dioscorea spp.)

LEAVES OF ROOT AND TUBER VEGETABLES (HUMAN FOOD OR ANIMAL FEED) GROUP - COMMODITIES - CROP GROUP 2

Beet, garden (Beta vulgaris)

Beet, sugar (Beta vulgaris)

Burdock, edible (Arctium lappa)

Carrot (Daucus carota)

Cassava, bitter and sweet (Manihot esculenta)

Celeriac (celery root) (Apium graveolens var. rapaceum)

Chervil, turnip rooted (Chaerophyllum bulbosum)

Chicory (Cichorium intybus)

Dasheen (taro) (Colocasia esculenta)

Parsnip (Pastinaca sativa)

Radish (Raphanus sativus)
Radish, oriental (daikon) (

Radish, oriental (daikon) (Raphanus sativus subvar. longipinnatus)

Rutabaga (Brassica campestris var. napobrassica)

Salsify, black (Scorzonera hispanica)

Sweet potato (ipomoea batatas)

Tanier (cocoyam) (Xanthosoma sagittifolium)

Turnip (Brassica rapa var. rapa)

Yam, true (Dioscorea spp.)

BULB VEGETABLES (Alliums spp.) GROUP - COMMODITIES - CROP GROUP 3

Chive, fresh leaves (Allium schoenoprasum L.)

Chive, Chinese, fresh leaves (Allium tuberosum Rottier ex Spreng)

Daylily, bulb (Hemerocallis fulva (L.) L. var. futva)

Elegans hosta (Hosta Sieboldiana (Hook) Engl)

Fritillaria, bulb (Fritillaria L. fritillary)

Garlic, bulb (Allium sativum L. var. sativum) (A. sativum Common Garlic Group)

Garlic, great headed, bulb (Allium ampeloprasum L. var. ampeloprasum) (A. ampeloprasum Great Headed Garlic Group)

Garlic, Serpent, bulb (Allium sativum var. ophioscorodon or A. sativum Ophioscorodon Group)

Kurrat (Allium kurrat Schweinf, Ex. K. Krause or A. ampeloprasum Kurrat Group)

Lady's leek (Allium cemuum Roth)

Leek (Allium porrum L. (syn: A. ampeloprasum L. var. porrum (L.) J. Gay) (A. ampeloprasum Leek Group)

Leek, wild (Allium tricoccum Aiton)

Lily, bulb (Lilium spp. (Lilium Leichtlinil var. maximowiczil, Lilium lancifolium))

Onion, Beltsville bunching (Allium x proliferum (Moench) Schrad.) (syn: Allium fistolosum L. x A. cepa L.)

Onion, bulb (Allium cepa L. var. cepa) (A. cepa Common Onion Group)

Onion, Chinese, bulb (Allium chinense G. Don.) (syn: A. bakeri Regel)

Onion, fresh (Allium fistolosum L. var. caespitosum Makino)

Onion, green (Allium cepa L. var. cepa) (A. cepa Common Onion Group)

Onion, macrostem (Allium macrostemom Bunge)

Onion, pearl (Allium pomom var. sectivum or A. ampeloprasum Pearl Onion Group)

Onion, potato, bulb (Allium cepa L. var. aggregatum G. Don.) (A. cepa Aggregatum Group)

Onion, tree, tops (Allium x proliferum (Moench) Schrad. Ex Wild.) (syn: A. cepa var. proliferum (Moench) Regel. A. cepa L. var. bulbiferum L.H. Bailey, A. cepa L. var. Viviparm (Metz) Alef.)

Onion, Welsh, tops (Allium fistolosum L.)

Shallot, fresh leaves (Allium cepa var. aggregatum G.Don.)

Cultivars, varieties, and/or hybrids of these.

LEAFY VEGETABLES (EXCEPT BRASSICA VEGETABLES) GROUP - CROP GROUP 4

Amaranth (leafy amaranth, Chinese Spinach, tampaia) (Amaranthus spp.)

Arugula (Roquette) (Eruca sativa)

Cardoon (Cynara cardunculus)

Celery (Apium graveolens var. dulce)

Celery, Chinese (Apium graveolens var. secalinum)

Celtuce (Lactuca sativa var. Angustana)

Chervil (Anthriscus cerefolium)

Chrysanthemum, edible-leaved (Chrysanthemum coronarium var. coronarium)

Chrysanthemum, garland (Chrysanthemum coronarium var. spaliosum)

Corn salad (Valerianella locusta)

Cress, garden (Lepidium sativum)

Cress, upland (yellow rocket, winter cress) (Barbarea vulgaris)

Dandelion (Taraxacum officinale)

Dock (sorrel) (Rumex spp.)

Endive (escarole) (Cichorium endivia)

Fennel, Florence (finachio) (Foeniculum vulgare Azoricum Group)

Lettuce, head and leaf (Lactuca sativa)

Orach (Atriplex hortensis)

Parsley (Petroselinum crispum)

Purslane, garden (Portulaca oleracea)

Purslane, Winter (Montia perfoliata)

Radicchio (red chicory) (Cichorium intybus)

Rhubarb (Rheum rhabarbarum)

Spinach (Spinacia oleracea)

Spinach, New Zealand (Tetragonia tetragonioides, T. Expansa)

Spinach, vine (Malabar spinach, Indian spinach) (Baselia alba)

Swiss chard (Beta vulgaris var. cicla)

BRASSOCA (COLE) LEAFY VEGETABLES - CROP GROUP 5

Broccoli (Brassica oleracea var. botrytis)

Broccoli, Chinese (gai lon) (Brassica alboglabra)

Broccoli raab (rapini) (Brassica campestria)

Brussel sprouts (Brassica oleracea var. gemmifera)

Cabbage (Brassica oleracea)

Cabbage, Chinese (bok choy) (Brassica chinensis)

Cabbage, Chinese (napa) (Brassica pekinensis)

Cabbage, Chinese mustard (gai choy) (Brassica campestris)

Cauliflower (Brassica oleracea var. botrytis)

Cavalo broccolo (Brassica oleracea var. Botrytis)

Collards (Brassica oleracea var. acephala)

Kale (Brassica oleracea var. Acephala)

Kohlrabi (Brassica oleracea var. gongylodes)

Mizuna (Brassica rapa Japonica Group)

Mustard greens (Brassica juncea)

Mustard spinach (Brassica rapa Perviridis Group)

Rape greens (Brassica napus)

LEGUME VEGETABLES (SUCCULENT OR DRIED) - CROP GROUP 6

Bean (Lupinus spp.) (includes grain lupin, sweet lupin, white lupin, and white sweet lupin)

Bean (*Phaseolus spp.*) (includes field bean, kidney bean, lima bean, navy bean, pinto bean, runner bean, snap bean, tepary bean, wax bean)

Bean (Vigna spp.) (includes adzuki bean, asparagus bean, blackeyed pea, catjang, Chinese longbean, cowpea, Crowder pea, moth bean, mung bean, rice bean, southern pea, urd bean, vardlong bean)

Broad bean (fava bean) (Vicia faba)

Chickpea (garbanzo bean) (Cicer arietinum)

Guar (Cyamopsis tetragonoloba)

Jackbean (Canavalia ensiformis)

Labfab bean (hyacinth bean) (Lablab purpureus)

Lentil (Lena esculenta)

Pea (*Pisum spp.*) (includes dwarf pea, edible-pod pea, English pea, field pea, garden pea, Green pea, snow pea, sugar snap pea)

Pigeon pea (Cajanus cajan)

Soybean (Glycine max)

Soybean (immature seed) (Glycine max)

Sword bean (Canavalia gladiate)

FOLIAGE OF LEGUME VEGETABLE GROUP - CROP GROUP 7

Any cultivar of bean (Phaseolus spp.) and field pea (Pisum spp.) and soybean (Glycine max)

FRUITING VEGETABLES (EXCEPT CUCURBITS) - COMMODITIES - CROP GROUP 8

Eggplant (Bolanum melongena)

Groundcherry (Physalis spp.)

Pepino (Solanum muricatum)

Pepper (Capsicum spp.) (includes bell pepper, chili pepper, cooking pepper, pimento, sweet pepper)

Tomatillo (Physalis ixocarpa)

Tomato (Lycopersicon esculentum)

CUCURBIT VEGETABLES - CROP GROUP 9

Chayote (fruit) (Sechium edule)

Chinese waxgourd (Chinese preserving melon) (Benincasa hispida)

Citron melon (Citrullus ianatus var. citroides)

Cucumber (Cucumis sativus)

Gherkin (Cucumis anguna)

Gourd, edible (Lagenaria spp.) (Includes hyotan, cuczza); (Luffa acutangula, L. cylindrica) (includes hechima, Chinese okra)

Momordica spp. (includes balsam Apple, balsam pear, bitter melon, Chinese Cucumber)

Muskmelon (hybrids and/or cultivars of *Cucumis melo*) (includes true cantaloupe, cantaloupe, casaba, Crenshaw melon, golden pershaw melon, honeydew melon, honey balls, mango melon, Persian melon, pineapple melon, Santa Claus melon and snake melon)

Pumpkin (Curcubita spp.)

Squash, summer (Cucurbita pepo var. melopepo) (includes crookneck squash, scallop squash, straightneck squash, vegetable marrow, zucchini)

Squash, winter (Cucurbita maxima; C. moschata) (includes butternut squash, Calabaza, Hubbard squash); (C. mixta; C. pepo) (includes acorn squash, spaghetti squash)

Watermelon (includes hybrids and/or varieties of Citrullus lanatus)

CITRUS FRUITS (CITRUS spp., FORTUNELLA spp.) GROUP - COMMODITIES - CROP GROUP 10

Calamondin (Citrus milis * Citrofortunella mitis)

Citrus citron (Citrus medica)

Citrus hybrids (Citrus spp.) (includes chironja, tangelo, tangor)

Grapefruit (Citrus paradisi)

Kumquat (Fortunella spp.)

Lemon (Citrus jambhiri, Citrus limon)

Lime (Citrus aurantiifolia)

Mandarin (tangerine) (Citrus reticulata)

Orange, sour (Citrus aurantium)

Orange, sweet (Citrus ainensis)

Pummelo (Citrus grandis, Citrus maxima)

Satsuma mandarin (Citrus unshiu)

POME FRUITS GROUP - COMMODITIES - CROP GROUP 11

Apple (Malus domestica)

Crabapple (Malus spp.)

Loquat (Eriobotrya japonica)

Mayhaw (Crataegus aestivalis, C. opaca. And C. rufula)

Pear (Pyrus communis)

Pear, oriental (Pyrus pyrifolia)

Quince (Cydonia oblonga)

STONE FRUITS GROUP - COMMODITIES - CROP GROUP 12

Apricot (Prunus amemiaca)

Cherry, sweet (Prunus avium)

Cherry, tart (Prunus cerasus)
Nectarine (Prunus persica)
Peach (Prunus persica)
Plum (Prunus domestice, Prunus spp.)
Plum, Chickasaw (Prunus angustifolia)
Plum, Damson (Prunus domestica spp. Insititia)
Plum, Japanese (Prunus salicina)
Plumcot (Prunus ameniaca × P. domestica)
Prune (fresh) (Prunus domestica, Prunus spp.)

BERRIES GROUP - CROP GROUP 13

Blackberry (*Rubus eubatus*) (including bingleberry, black satin berry, boysenberry, Cherokee blackberry, Chesterberry, Cheyenne blackberry, coryberry, darrowberry, dewberry, Dirksen thornless berry, Himalayaberry, hullberry, Lavacaberry, lowberry, Lucretiaberry, mammouth blackberry, marionberry, nectarberry, ciallieberry, Oregon evergreen berry, phenomenalberry, rangeberry, ravenberry, rossberry, Shawnee blackberry, youngberry, and varieties and/or hybrids of these)

Blueberry (Vaccinium spp.)

Currant (Ribes spp.)

Elderberry (Sambucus spp.)

Gooseberry (Ribes spp.)

Huckleberry (Gaylussacia spp.)

Loganberry (Rubus loganobaccus)

Raspberry, black and red (Rubus occidentalis, Rubus strigosus, Rubus idaeus)

BERRY AND SMALL FRUIT CROP GROUP - CROP GROUP 14

Amur river grape (Vitis amurensis Rupr)

Aronia berry (Aronia spp.)

Bayberry (Myrica spp.)

Bearberry (Arctostaphylos uva-ursi)

Bilberry (Vaccinium myrtillus L.)

Blackberry (*Rubus spp.*) (including Andean blackberry, arctic blackberry, bingleberry, black satin berry, boysenberry, brombeere, California blackberry, Chesterberry, Cherokee blackberry, Cheyenne blackberry, common blackberry, coryberry, darrowberry, dewberry, Dirksen thornless berry, evergreen blackberry, Himalayaberry, hullberry, Lavacaberry, loganberry, lowberry, Lucretiaberry, mammoth blackberry, marionberry, mora, mures deronce, nectarberry, Northern dewberry, olallieberry, Oregon evergreen berry, phenomenalberry, rangeberry, ravenberry, rossberry, Shawnee dewberry, tayberry, youngberry, zarzamora and cultivars, varieties and/or hybrids of these.)

Blueberry, highbush (Vaccinium spp.)

Blueberry, lowbush (Vaccinium angustifolium Aiton)

Buffalo currant (Ribes aureum Pursh)

Buffaloberry (Shepherdia argentea (Pursh) Nutt.)

Che (Cudrania tricuspidata Bur. Ex Lavallee)

Chilean guava (Myrtus ugni Mol.)

Chokecherry (Prunus virginiana L.)

Cloudberry (Rubus chamaemorus L.)

Cranberry (Vaccinium macrocarpon Aiton)

Currant, black (Ribes nigrum L.)

Currant, red (Ribes rubrum L.)

Elderberry (Sambucus spp.)

European barberry (Berberia vulgaris L.)

Gooseberry (Ribes spp.)

Grape (Vitis spp.)

Highbush cranberry (Viburnum opulus L. var. Americanum Aiton)

Honeysuckle, edible (Lonicera caerula L. var. emphyllocalyx Nakai, Lonicera caerula L. var. edulis Turcz. Ex herder)

Huckleberry (Gaylussacia spp.)

Jostaberry (Ribes × nidigrolaria Rud. Bauer and A. Bauer)

Juneberry (Saskatoon berry) (Amelanchier spp.)

Kiwifruit, fuzzy (Actinidia deliciosa A. Chev.) (C.F. Liang and A.R. Fergusons, Actinida chinensis Planch)

Kiwifruit, hardy (Actinidia argula (Siebold and Zucc.) Planch ex Mig)

Lingonberry (Vaccinium vitis-idaea L.)

Maypop (Passiflora incarnate L.)

Mountain pepper berries (Tasmannia lanceolate) (Poir.) A.C. Sm.

Mulberry (Morus spp.)

Muntries (Kunzea pornifera F. Muell)

Native currant (Acrotriche depressa R.BR.)

Partridgeberry (Mitchella repens L.)

Phalsa (Grewia subinaequalis DC)

Pinchberry (Prunus pensylvanica L.f.)

Raspberry, black and red (Rubus spp.)

Riberry (Syzygium luehmannii)

Salal (Gaultheria shallon Pursh)

Schisandra berry (Schisandra chinensis (Turcz.) Baill.)

Sea buckthorn (Hippophae rhamnoides L.)

Serviceberry (Sorbus spp.)

Strawberry (Fragaria × ananassa Duchesne)

Wild raspberry (Rubus muelleri Lefevre ex P.J. Mull)

Cultivars, varieties and/or hybrids of these.

TREE NUTS - COMMODITIES - CROP GROUP 14

Almond (Prunus dulcis)

Beech nut (Fagus spp.)

Brazil nut (Bertholletia excelsa)

Butternut (Juglans cineree)

Cashew (Anacardium occidentale)

Chestnut (Castanea spp.)

Chinquapin (Castanea pumila)

Filbert (hazelnut) (Corylus spp.)

Hickory nut (Carya spp.)

Macadamia nut (bush nut) (Macadamia spp.)

Pecan (Carva illinoensis)

Walnut, black and English (Persian) (Juglans spp.)

CEREAL GRAINS - COMMODITIES - CROP GROUP 15

Barley (Hordeum spp.)

Buckwheat (Fagopyrum esculentum)

Corn (Zea mays)

Millet, pearl (Pennisetum glaucum)

Millet, proso (Panicum millaceum)

Oats (Avena spp.)

Popcorn (Zea mays var. everta)

Rice (Oryza sativa)

Rye (Secale cereale)

Sorghum (milo) (Sorghum spp.)

Teosinte (Euchlaena mexicana)

Triticale (Triticum-Secale hybrids)

Wheat (Triticum spp.)

Wild rice (Zizania aquatica)

FORAGE, FODDER AND STRAW OF CEREAL GRAINS GROUP - CROP GROUP 16 Forage, fodder, and straw of all commodities included in the group cereal grains group

GRASS FORAGE, FODDER, AND HAY GROUP - CROP GROUP 17

Any grass, Gramineae family (either green or cured) except sugarcane and those included in the cereal grains group, that will be fed or grazed by livestock, all pasture and range grasses and grasses grown for hay or silage.

NONGRASS ANIMAL FEEDS (FORAGE, FODDER, STRAW, AND HAY) GROUP - CROP GROUP 18

Alfalfa (Medicago sativa subsp. sativa)

Bean, velvet (Mucuna pruniens var. utilis)

Clover (Trifolium spp., Melilotus spp.)

Kudzu (Puerana lobata)

Lespedeza (Lespedeza spp.)

Lupin (Lupinus spp.)

Sainfoin (Onobrychis vicifolia)

Trefoil (Lotus spp.)

Vetch (Vicia spp.)

Vetch, Crown (Coronilla vania)

Vetch, milk (Astragalus spp.)

HERBS AND SPICES GROP - CROP GROUP 19

Allspice (Pimenta dioica)

Angelica (Angelica archangelica)

Anise, (anise seed) (Pimpinella anisum)

Anise, star (Illicium verum)

Annatto (seed) (Bixaceae spp.)

Balm (lemon balm) (Melissa officinalis)

Basil (Ocimum basilicum)

Borage (Borago officinalis)

Burnet (Sanguisorba minor)

Camomile (Anthemis nobilis)

Caper bulbs (Cappanis spinosa)

Caraway (Carum carvi)

Caraway, black (Nigella sativa)

Cardamom (Elettaria cardamomum)

Cassia bark (Cinnamomum aromaticum)

Cassia buds (Cinnamomum aromaticum)

Catnip (Nepeta cataria)

Celery seed (Apicum graveolens)

Chervil (dried) (Anthriacus cerefolium)

Chive (Allium schoenoprasum)

Chive, Chinese (Aillium tuberosum)

Cinnamon (Cinnamomum verum)

Clary (Salvia sclarea)

Clove buds (Eugenia caryophyllata)

Coriander (cilantro or Chinese parsley) (leaf) (Coriandrum sativum)

Coriander (cilantro) (seed) Coriandrum sativum)

Costmary (Chrysanthemum balsamita)

Culantro (leaf) (Eryngium foetidum)

Culantro (seed) (Eryngium foetidum)

Cumin (Cuminum cyminum)

Curry (leaf) (Murraya koenigii)

Dill (dillweed) (Anethum graveolens)
Dill (seed) (Anethum graveolens)

Fennel (common) (Foeniculum vulgare)

Fennel, Florence (seed) (Foeniculum vulgare Azoricum Group)

Fenugreek (Trigonella foenumigraecum)

Grains of paradise (Aframomum melegueta)

Horehound (Marrubium vulgare)

Hyssop (Hyssopus officinalis)

Juniper berry (Juniperus communis)

Lavender (Lavandula officinalis)

Lemongrass (Cymbopogon citratus)

Lovage (leaf) (Levisticum officinale)

Lovage (seed) (Levisticum officinale)

Mace (Myristica fragrans)

Marigold (Calendula officinalis)

Marjoram (Origanum spp.) (includes sweet or annual marjoram, wild marjoram or oregano, and pot marjoram)

Mustard (seed) (Brassica juncea, B. hirta, B. nigra)

Nasturtium (Tropaeolum majus)

Nutmeg (Myristica fragrans)

Parsley (dried) (Petroselinum crispum)

Pennyroyal (Mentha pulegium)

Pepper, black (Piper nigrum)

Pepper, white

Poppy (seed) (Papaver somniferum)

Rosemary (Rosemarinus officinalis)

Rue (Ruta graveolens)

Saffron (Crocus sativus)

Sage (Salvia officinalis)

Savory, summer and winter (Satureja spp.)

Sweet bay (bay leaf) (Laurus nobilis)

Tansy (Tanacetum vulgare)

Tarragon (Artemisia dracunculus)

Thyme (Thymus spp.)

Vanilla (Vanilla planifolia)

Wintergreen (Gaultheria procumbens)

Woodruff (Galium odorata)

Wormwood (Artemisia absinthium)

EDIBLE FUNGI GROUP - COMMODITIES - CROP GROUP 21

Blewitt (Lepista nuda)

Bunashimeji (Hypsizygus marmmoreus)

Chinese mushroom (Volvariella volvacea) (Bull.) Singer

Enoki (Fiammulina velutipes) (Curt.) Singer

Hime-Matsutake (Agaricus blazei) Murill

Hirmeola (Auricularia auricular)

Maitake (Grifola frondosa)

Morel (Morchella spp.)

Nameko (Pholiota nameko)

Net Bearing (Dictyophora)

Oyster mushroom (Pleurotus spp.)

Pom Pom (Hericium erinaceus)

Reishi mushroom (Ganoderma lucidum (Leyss. Fr.) Karst.)

Rodman's Agaricus (Agaricus bitorquis) (Quel.) Saccardo

Shitake mushroom (Lentinula edodes (Berk.) Pegl.)

Shimeji (Tricholoma conglobatum) Stropharia (Stropharia spp.) Truffle (Tuber spp.) White button mushroom (Agaricus bisporous (Lange) Imbach) White Jelly Fungi (Tremella fuciformis)

expires 05-31-98		 				
EPA F	United S	States		☐ Regist	ration	OPP Identifier Number
EPA En	vironmental Pro	otection A	gency	☐ Amen	dment	ł
	Washington,	DC 20460	•	_ ☑ Other:		
			or Pesi	icide - Secti		
Company/Product Number				oduct Manager		Proposed Classification
85937-2			ANDREV	V BRYCELAND		1
Company/Product (Name) Bug Oil Food Use, Alternate Bran	nd Name:NERIOtm	F	M#		· .	X None Restricted
Name and Address of Applicant (Include ZIP Code)	6	Exped	lited Review.	In accordance w	rith FIERA Section 3(c)(3)
PLANT IMPACT plc		(1	b)(l), my	product is sim	ilar or identical i	n composition and labeling
Rothamsted, West Common,			0:			•
Harpenden, Hertforshire, AL5 2JC	Į		:PA Reg	. No		
United Kingdom			Product N	Jame		
		'	TOGGOT 1	<u> </u>		
Check if this is a new a	ddress					
		9	Section	- II		
Amendment – Explain below.			į	Final printed I	abels in response to	Agency letter dated
Resubmission in response to A	\gency letter dated _	<u></u>	ļ	"Me Too" Appl	ication	
X Notification - Explain below.				Other - Explai		
Explanation: Use additiona					•	
Alternate Brand Name NERIOtm. This	notification is cons	istent with the	e provisio	ns of PRN-98-10 a	nd EPA regulations	at 40 CFR 152.46 and no other
changes have been made to the labe	or the confidential	statement of	formula o	of this product. I u	nderstand that it is	a violation of 18 U.S.C. Sec.
1001 to willfully make any false state CFR 152.46, this product may be in v	ment to EPA. I furth	er ungerstand d I may be sul	d that if tr biect to er	ils notification is r	ot consistent with t	the terms of PRN-98-10 and 40
over 100 cmb produce may be my	notation of 111 NA an	a i may be sui	oject to ei	norcement action	and penalties unde	er sections 12 and 14 of FIFRA.
		s	ection	- 111		
Material This Product Will Be Pa Child-Resistant Packaging				IV. C. L. L. D.		
Yes*	Unit Packaging Yes			Water Soluble Pa	ckaging	2. Type of Container
No.	☐ No			No No		Metal Plastic
	If "Yes"	No. pe	r	If "Yes"	No. per	Glass
*Certification must	Unit Packaging	wgt. contair	ner	Package wgt.	container	Paper
be submitted						Other (Specify)
3. Location of Net Contents Informa	ntion 4. S	Size(s) Retail (Container		5. Location of	Label Directions
X Label Cont	ainer 1 g	allon, 1 liter				
				·	On labelir	ng accompanying product
6. Manner in Which Label is Affixed	===	Lithograph Paper glued		Other_		
	<u> </u>	Stenciled				
Section - IV						
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)						
Name		Title			η Τ	elephone No. (Include Area
M. SAM BONDURANT		cc	NSULTA	NT	(Code)
William					ļ	901-751-0933 OR 901-490-4755
	Certi	fication				6. Date Application
I certify that the statements I have macknowledge that any knowingly fals under applicable law.	nade on this form and	d all attachme	nts thereto punishab	o are true, accurate le by fine or impris	e and complete. I conment or both	Received (Stamperl)
2. Signature Bours	Lurans	3. Title	SULTAN	Т		
4. Typed/Name /		5. Date	•			
M. SAM BONDURANT		sE	PTEMBE	R 16, 2016		

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete

White- EPA File Copy (original) Yellow- Applicant Copy



Via Federal Express Overnight TRK#7772 5729 6463

September 16, 2016

U.S. Environmental Protection Agency Document Processing Desk (NOTIF) Office of Pesticide Programs (7504P) Room S4900, One Potomac Yard 2777 Crystal Drive Arlington, VA 22202

Attn: Andrew Bryceland, Team Leader

Biochemical Pesticide Branch

Dear Mr. Bryceland:

SUBJECT: Plant Impact plc, EPA Reg. No. 85937-2

Bug Oil Food Use, Notification of Alternate Brand Name: NERIO ™

Enclosed are the following documents for your consideration:

- EPA Form 8570-1 Notification of Alternate Brand Name
- 1 Clean copy of Bug Oil Food Use Master Label, Commercial and Residential
- 1 Marked up copy of Bug Oil Food Use Master Label Commercial and Residential showing Alternate Brand Name NERIO™
- Stamped, self-addressed postcard for your use in notifying acceptance of Alternate Brand Name Notification

Sincerely on behalf of

PLANT IMPACT plc

M. Sam Bondurant Regulatory Consultant

Ph. 901.751.0989 or 901.496.4755

Jan Boudwant

Enclosures: As Stated



U.S. Environmental Protection Agency 1200 Pennsylvania Avenue, N.W. Washington, DC 20460

26th September 2016

Subject:

Notice of Representation

To Louis Vaughn (Fax: +1-703-305-7670);

By means of this document,

Plant Impact plc West Common, Harpenden Hertfordshire, AL5 2JQ United Kingdom

confirms that:

M. Sam Bondurant Bondurants Consulting LLC 2502 Cedar Ridge Drive Germantown, TN 38138 USA (901) 751-0989 sam@bondurantsllc.com

has been engaged to represent Plant Impact plc before the EPA as required for the purpose of obtaining registration of pesticide products (including Bug Oil; EPA registration numbers 85937-1 and 85937-2).

M. Sam Bondurant is an added EPA agent and the effective date of this change is 25th July 2016. Any listed current EPA agents are to remain active.

Yours sincerely,

Plant Impact Plc Vidnolos Coan

Dr. Nicholas Moon Global Regulatory Manager



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

FEB 0 5 2015

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Plant Impact plc c/o James Messina Exponent 1150 Connecticut Avenue, NW Suite 1100 Washington, DC 20036

Subject:

Submission of Storage Stability and Corrosion Characteristics studies to satisfy term of

registration.

Product Names and EPA Reg. Nos.: Bug Oil Ornamental (EPA Reg. No. 85937-1) and

Bug Oil Food Use (EPA Reg. No. 85937-2) Your submissions dated November 4, 2014 Decision Numbers: 497617 and 497743

Dear Mr. Messina:

The submissions of the Storage Stability (OCSPP Guideline No. 830.6317) and Corrosion Characteristics (OCSPP Guideline No. 830.6320) studies referred to above submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, have been received and reviewed, and the studies are acceptable. You have satisfied OCSPP guideline studies 830.6317 and 830.6320 as required and outlined in your Notice of Pesticide Registrations dated March 27, 2012.

Enclosed are the new Notice of Pesticide Registrations for your products. Should you have any questions, you may contact Mr. Colin Walsh directly at (703) 308-0298 or via email at walsh.colin@epa.gov.

Sincerely,

Linda A. Hollis, Chief

Biochemical Pesticides Branch

Biopesticides and Pollution

Prevention Division (7511P)

CONCURRENCES					
SYMBOL > 7511P					
surname > Walsh					
DATE > 1/29/15					

ÉPA Form 1320-1A (1/90)

Printed on Recycled Paper



U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Biopesticides and Pollution Prevention Division (7511C) 1200 Pennsylvania Avenue NW Washington, DC 20460

EPA Reg. Number:

Date of Issuance:

85937-2

FEB 0 5 2015

Term of Issuance:

Unconditional

NOTICE OF PESTICIDE:

X Registration Reregistration

(under FIFRA, as amended)

Name of Pesticide Product:

Bug Oil Food Use

Name and Address of Registrant (include ZIP Code):

Plant Impact plc

Rothamsted

West Common

Harpenden

Hertfordshire

AL5 2JQ

United Kingdom

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Biopesticides and Pollution Prevention Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA). Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on her motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This registration does not eliminate the need for continual reassessment of the pesticide. If the EPA determines at any time that additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under section 3(c)(2)(B) of FIFRA.

This product is unconditionally registered in accordance with FIFRA Sec. 3(c)(5) and is subject to the following terms:

- Submit and/or cite all data required for registration of your product under FIFRA section 3(c)(5) and section 4 when the Agency requires all registrants of similar products to submit such data.
- 2. Revise the EPA Registration Number to read, "EPA Reg. No. 85937-2."
- Submit three (3) copies of the revised final printed labeling before you release the product for shipment.

A stamped copy of the label and an A-79 Enclosure are enclosed for your records.

ļ	Signature of Approving Official:		Date:		
	Linda A. Hollis, Chief		2/5/14		
	Linda A. Hollis, Chief			1/4	
	Blochemical Pesticides Branch	CONCURRENCES			
SYMBO	Riopesticides and Pollution Prevention Division	26110			
SURNAN	EPA Form 8570-6	Walsh			
DATE	>	1/29/16			

EPA Form 1320-1A (1/90)

Printed on Recycled Paper

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DP Number: 424280 EPA Reg. No.: 85937-2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

MEMORANDUM

DATE:

January 20, 2015

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

SUBJECT:

Science Review In Support of the Registration of Bug Oil Food Use containing Canola

Oil, Tagetes Oil, Thyme Oil and Wintergreen Oil as its active ingredients.

Decision Number:

497743

DP Number:

424280

EPA File Symbol Number:

85937-2 Biochemical

Chemical Class: PC Code:

011332, 176602, 597800, 176601, respectively

CAS Number:

120962-03-0, 8016-84-0, 8007-46-3, 68917-75-9, respectively

Tolerance Exemptions:

40 CFR 180.950 for all active ingredients

MRID Numbers:

49505501

FROM:

Angela L. Gonzales, Biologist

/s/

Biochemical Pesticides Branch

Biopesticides & Pollution Prevention Division (7511P)

TO:

Colin Walsh, M.S., Regulatory Action Leader

Biochemical Pesticides Branch

Biopesticides & Pollution Prevention Division (7511P)

ACTION REQUESTED

In response to the request for additional information discussed in the memorandum from A.L. Gonzales to C. Walsh dated 2/21/12 and relayed to the applicant as a condition of registration for the product, the applicant has submitted a corrosion characteristics study in MRID 49505501.

RECOMMENDATIONS AND CONCLUSIONS

1. The product chemistry submission is ACCEPTABLE.

a. The submitted corrosion characteristics data are acceptable. No evidence of corrosion or changes to the product packaging were observed during the 12-month study.

2

STUDY SUMMARY

Product Chemistry (MRID 49505501)

In response to the Agency's concern regarding alterations (paneling) in the product packing observed in the storage stability and corrosion characteristics studies originally submitted to the Agency (MRIDs 48339001 and 48649808), the applicant conducted a new corrosion characteristics study on the product which has been packaged in alternative material with the headspace nitrogen-purged. Refer to the memorandum from A. L. Gonzales to C. Walsh dated 2-21-12 for more information. The product is now packaged in a heavy-weight Coex bottle. During packaging, the headspace is nitrogen-purged, which should eliminate oxidation of the active ingredients. The applicant indicated previously to the Agency that oxidation of the active ingredients may be the cause of the changes to the container observed in the previous corrosion characteristics studies. In the new study, the product was stored under typical warehouse conditions. The physical appearance of the test substance was observed every three months and the product packaging was observed monthly. Over the 12-month period, there were no observations of changes to the product packaging or to the test substance.

cc: Angela L. Gonzales, Colin Walsh, BPPD Science Review File, IHAD/ARS A. L. Gonzales, FT, PY-S: 1/20/15

DATA PACKAGE BEAN SHEET

Date: 03-Dec-2014

* * * Registration Information * * *

Page 1 of 3

Decision #: 497743 DP #: (424280) NON PRIA

Parent DP #:

Submission #: 960063

E-Sub #:

Registration:	85937-2 - BUG OIL FOOD US	SE		
Company:	85937 - PLANT IMPACT PLC.			_
Risk Manager:	RM 91 - Andrew Bryceland - (703) 30	5-6928 Room# PY1 S-8911		
Risk Manager Reviewer:	Colin Walsh CWALSH			
Sent Date:	05-Nov-2014	PRIA Due Date: 02-Feb-2015	Edited	Due Date:
Type of Registration:	Product Registration - Section 3			
Action Desc:	(300) LABEL REVISION;NO DATA R	EQUIRED;		_
	See page 3	•		_
	* * * Data Pa	ackage Information *	* *	
Expedite:	◯ Yes ● No	Date Sent: 03-Dec-2014	-	Due Back:
DP Ingredient:	See page 3		•	_
DP Title:				***
Assigned To	<u> </u>	Date In Date Out		
Organization: BPPD	/ BPB		Last Possible Science	Due Date: 19-Dec-2014
			Science	Due Date:
			Sub Data Package	Due Date:
		Sent for Review * * *		

Printed on Page 2

* * * Additional Data Package for this Decision * * *

No Additional Data Packages

* * * Data Package Instructions * * *

Dear Reviewer,

Please review this Storage Stability and Corrosion Characteristics study (MRID 49505501). These data are for both EPA Reg. Nos. 85937-1 and -2.

Science Review due date January 22, 2015. Fast Track due date February 2, 2015.

DP#: (424280)

* * * Studies Sent for Review * * *

Decision#: (497743)

			D0010101111. (-101 1 -10)
MRID: MRID Status	Cliation Reference	<u>Culceline</u>	
49505501	Lenyk, F. (2014) Bug Oil Storage Stability and Corrosion Characteristics. Project Number: PR100/2013/003. Unpublished study prepared by Plant Impact Pilot Laboratory. 27p.	830.6317/Storage stability	Pass (19-Nov-2014)
49505501	Lenyk, F. (2014) Bug Oil Storage Stability and Corrosion Characteristics. Project Number: PR100/2013/003. Unpublished study prepared by Plant Impact Pilot Laboratory. 27p.	830.6320/Corrosion characteristics	Pass (19-Nov-2014)

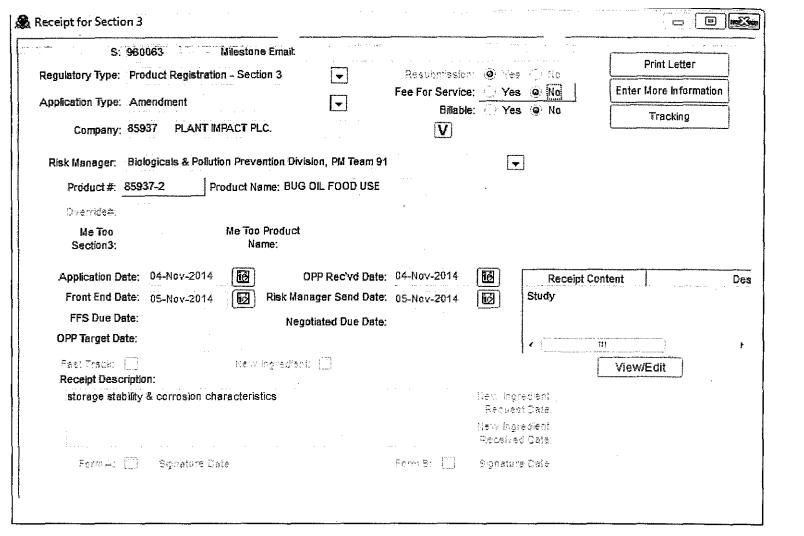
Page 3

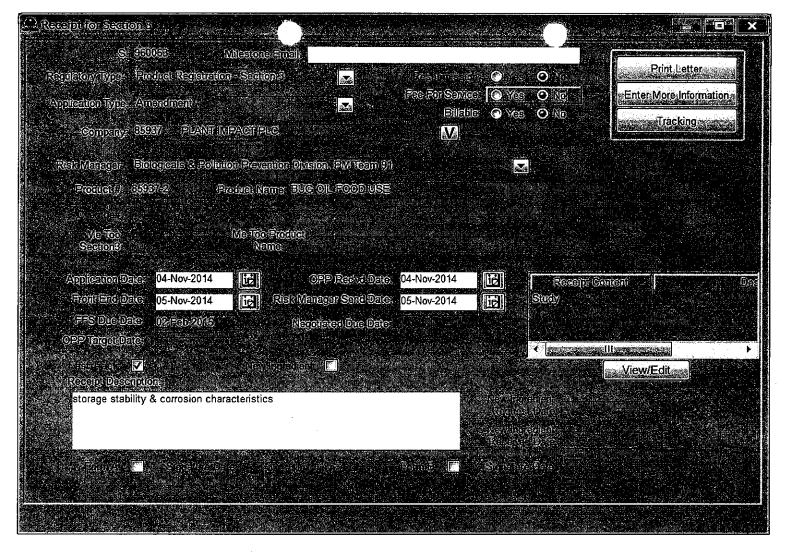
DP#: (424280)

* * * Product and Data Package Ingredients * * *

Decision#: (497743)

PC Code	(CS	Ingredien(tName s
011332	120962-03-0	Canola oil
597800	8007-46-3	Oil of thyme
176601	68917-75-9	Oils, wintergreen
176602	8016-84-0	Oils, Tagetes
176602	8016-84-0	Oils, Tagetes(.6%)
176601	68917-75-9	Oils, wintergreen(.001%)
597800	8007-46-3	Oil of thyme(.6%)
011332	120962-03-0	Canola oil(93.899%)





This submission grundlaces # 457743

Administrative Materials

Please read instructions o	n reverse before completing fo	rm.	Form Appr	oved. OMB No	. 2070-0060.	Approval expires 05-31-98
EPA	United States Environmental Protection Agence Washington, DC 20460			Regis	stration ndment	OPP Identifier Number
Application for Pesticide - Section I						
Company/Product Numbe 85937-2	r		EPA Product Man Linda Hollis	ager	3. Pr	oposed Classification
Company/Product (Nam Plant Impact Pic / Bug Oil For			5. PM BPPD			None Restricted
5. Name and Address of App Plant Impact Rothamsted, West Com 2JQ, United Kingdom	nmon, Harpenden, Hertford	Ishire, AL5		v. In accordance dentical in comp	e with FIFRA Sosition and lab	Section 3(c)(3)(b)(l), my eling to:
			Product Name			
Check if thi	s is a new address		Flocuct Name		·	
cnock if and	5 10 ti 11017 titatiros	Sec	tion II			
Notification - Explain be Explanation: Use additional p	se to Agency letter dated XX-XX-	I and Section	"Me Too" Applic Other - Explain to	ation pelow.	<u>.</u>	er dated XX-XX-XXXX
Odbinission of Otorage Stabili	ty and Corrosion Characteristics			1 for Bug Oil Fo	od Use (EPA F	Reg. No. 85937-2)
		Sect	ion III			
Material This Product Will	T	<u> </u>				
Child-Resistant Packaging Yes* No *Certification must be submitted		o. per If	/ater Soluble Packaging Yes No Yes" No. package wgt.	er [pe of Containe Metal Plastic Glass Paper	
Location of Net Contents In Label	I 4. Size(s Container	s) Retail Contai	ner		of Label Direct	ify) Plastic Bag tions panying product
6. Manner in Which Label is A	Pap	ograph er glued nciled	Other			paritying product
Section IV						
	ems directly below for identification		to be contacted, if nece	ssary, to proces		
Name James N		Title Au	uthorized Representativ	e		lo. (Include Area Code) 202-772-4932
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. 6. Date Application Received (Stamped)						
2. Signature BY:		3. Title	Authorized Repre	esentative		
4. Typed Name: James	4. Typed Name: James Messina 5. Date:					



ATES ENVIRONMENTAL PROTECTION UNITED



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Plant Impact plc c/o James Messina Exponent 1150 Connecticut Avenue, NW Suite 1100 Washington, DC 20036

Subject:

Request to extend due date for term of registration.

Bug Oil Ornamental (EPA Reg. No. 85937-1) Bug Oil Food Use (EPA Reg. No. 85937-2) Your submissions dated December 5, 2012 Decision Numbers: 472652 and 472653

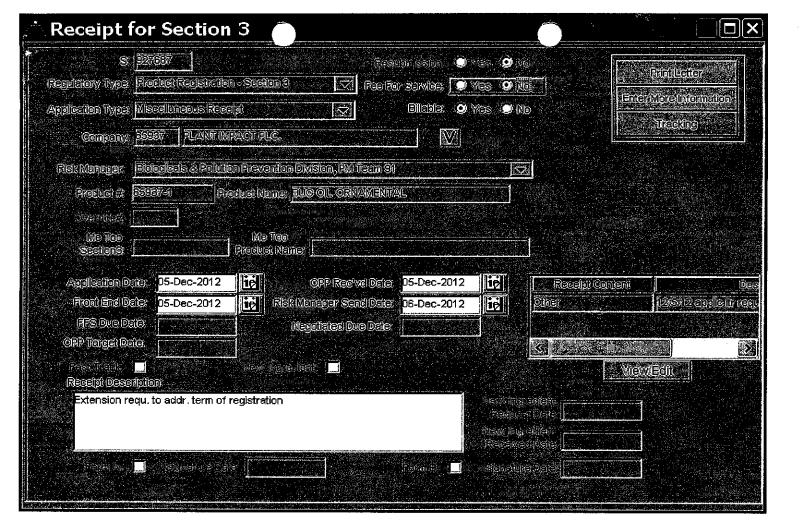
Dear Mr. Messina:

The submissions referred to above submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) section 3(c)(5), as amended, have been received and reviewed. In your Notice of Pesticide Registrations dated March 27, 2012, you were instructed to submit Storage Stability (OCSPP Guideline No. 830.6317) and Corrosion Characteristics (OCSPP Guideline No. 830.6320) studies within one year of the date of your registrations. In your letter dated December 5, 2012, you have requested that the due date for submitting the requested studies be extended to March 27, 2014 in order to provide evidence that a cosmetic affect to the packaging (i.e., paneling) has been corrected. You indicated that Plant Impact plc has worked diligently with their manufacturer and ingredient providers to create small batch sizes of the six proposed amendments to the packaging, the formulation, or a combination of both, and expect to start the one-year studies on December 13. 2012. This letter acknowledges receipt of your request, and your request to extend the due date for the term of registration for both EPA Reg. Nos. 85937-1 and 85937-2 is granted. You must submit the requested Storage Stability and Corrosion Characteristics guideline studies by March 27, 2014.

If these conditions are not complied with, the registrations will be subject to cancellation in accordance with FIFRA section 6(e). Should you have any questions, you may contact Mr. Colin Walsh directly at (703) 308-0298 or via email at walsh.colin@epa.gov.

Sincerely,

DA Form 4000 4 A (4/00)	Defeated on Wanted Barren	APERATA
TE > 2/27/13		
JRNAME > Wolfh	Prevention Division (7511P)	
MBOL ► 7611P	Biopesticides and Pollution	
	. CONCURBENCES mical Pesticides Branch	
· · · · · · · · · · · · · · · · · · ·	Emaa II. Ilomb, Omor	



Please read instructions	on reverse before completing	form.	Fo	orm Approv	ed. OMB No	. 2070-0060.	Approval expires 05-31-98
EPA	United States Environmental Protection Agency Washington, DC 20460			_	stration ndment r	OPP Identifier Number	
	Appl	ication for F	esticide -	Section	I		
Company/Product Numb 85937-1			2. EPA Prod Linda Hollis	luct Manage	er	3. Pr	oposed Classification
Company/Product (Nai Plant Impact Plc / Bug Oil O	ne) rnamental		5. PM BPPD				None Restricted
5. Name and Address of Ap Plant Impact	pplicant (Include ZIP Code)					e with FIFRA osition and lab	Section 3(c)(3)(b)(l), my beling to:
Rothamsted, West Co 2JQ, United Kingdom	mmon, Harpenden, Hertfo	ordshire, AL5		•			
			EPA Reg. No				<u></u>
Check if ti	his is a new address						
		Sec	tion II	-1			
Amendment - Explain to Resubmission in respo	nse to Agency letter dated 1-30	-2012	"Me Too	inted labels o" Applicati Explain belo	on	to Agency lette	er dated XX-XX-XX
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Status Update and Extension Requests for Conditions of Registration							
		Sec	tion III				
Material This Product Will Child-Resistant Packaging	I Be Packaged In: Unit Packaging	v	Vater Soluble Pa	ackaging	2. Ty	pe of Containe	er
Yes*	Yes No		Yes No			Metal Plastic	
*Certification must be submitted	If "Yes" Unit Packaging wgt.		"Yes" ackage wgt.	No. per Containe	er [Glass Paper Other (Spec	ify) Plastic Bag
3. Location of Net Contents Label	Information 4. Siz	e(s) Retail Conta	iner				tions panying product
6. Manner in Which Label is	Affixed to Product	ithograph	Other _				
	i i i i i i i i i i i i i i i i i i i	aper glued tenciled					
		Sect	ion IV				
	items directly below for identific	ation of individua	to be contacted	d, if necess	ary, to proces	s this applicat	ion.)
Name Title James Messina			Telephone No. (Include Ar Authorized Representative			` '	
I certify that the stateme acknowledge that any k under applicable law.	s thereto are tru unishable by fin	e, accurate ne or impris	and complet onment or bc	e. I th	6. Date Application Rεceived (Stamped)		
2. Signature 3.							
Jhi- BY:			Authorize	ed Represe	entative		
	s Messina	5. Date:	Decer	mber 5, 2	2012		

E^xponent^{*}

December 5, 2012

Linda A. Hollis
Branch Chief
Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division (BPPD)
U.S. Environmental Protection Agency
One Potomac Yard, Room S-4900
2777 S. Crystal Drive
Arlington, VA 22202

Subject:

Status Update and Extension Requests for Conditions of Registration of Bug Oil

Food Use (EPA Registration Number 85937-2) and Bug Oil Ornamental (EPA

Registration Number 85937-1)

Dear M. Hollis:

On behalf of our client, Plant Impact plc (Plant Impact, Rothamsted, West Common, Harpenden, Hertfordshire, AL5 2JQ, United Kingdom, EPA Company Number 85937), Exponent is submitting this update and request for an extension of the due dates for the conditional data requirements noted in the Notices of Registration of Bug Oil Ornamental and Bug Oil Food Use, dated March 27, 2012. The Notices of Registration indicated that these products are unconditionally registered in accordance with FIFRA Section 3(c)(5) provided the registrant "submit within 1 year after the Date of Registration acceptable data packages for Guideline Studies: Storage Stability study (OPPTS GLN: 830.6317) and Corrosion Characteristics study (OPPTS GLN: 830.6320) for these products". The request for the data requirements is to provide evidence that a cosmetic affect to the packaging of two Bug Oil Formulations (standard and alternative) has been corrected, i.e., paneling, observed after 1 year under warehouse storage conditions. The corrosion characteristics study will be conducted in conjunction with the storage stability study and the combined storage stability and corrosion characteristics report will be submitted to EPA as a single data package upon completion of the combined study.

The purpose of this letter is to request an extension for submission of the data. According to the Notices of Registration, the data submission due date is March 27, 2013. This letter informs the EPA of the testing program progress and current status of the data and requests an extension for submittal of the data package. The enclosed table (Exhibit 1) lists the data requirements, the progress for testing, current status and the specified and adjusted due dates.

Plant Impact plc has worked diligently and made substantial progress towards completing the data. Three amendments to the packaging, the formulation or a combination of both were proposed to address the packaging cosmetic affect. Plant Impact plc worked with their

manufacturer and ingredient providers to create small batch sizes of the six proposed amendments. A U.S.-based CRO was identified, a contract was signed and the protocol finalized. The samples were shipped from the UK and arrived at the CRO on November 20, 2012 with an estimated study start date of December 13, 2012.

Based on our current planning and the timelines developed with the CRO, Plant Impact plc requests a one year extension (March 27, 2014) to submit the combined OPPTS 830.6317 and 830.6320 guideline study in fulfillment of the conditional data requirements.

Please let me know if you require additional information or if you would like to discuss this matter in further detail. I can be reached at 202-772-4932 or jmessina@exponent.com.

Sincerely,

James Messina

Authorized Representative of

Plant Impact plc

Enclosures

cc: Dr. Steve Adams, Plant Impact plc Wendy Hillwalker, Exponent Linda Hollis December 5, 2012 Page 1 of 1

Exhibit 1 Registration Review Data Requirements Study Status/Due Dates/Extension Requests

OCSPP Guideline	Assay Name	Test Material	Performing Laboratory	Date Study Anticipated to Commence	Notice of Registration Due Date	Requested Extension Date
830.6317, 830.6320	Combined storage stability and corrosion characteristics study	3 proposed amendments applied to 2 formulations (standard and alternative)	PSL Eurofins, New Jersey, USA	December 13, 2012	March 27, 2013	March 27, 2014

Material Sent for Data Extraction

Reg. # 85937 - E (2)				
Description: New Registration				
Material(s) Sent to Data Extraction Contractors:				
New Stamped Label Dated				
Notification Dated				
New CSF(s) Dated				
☐ Other:				
☐ Decision #:				
☐ Other Action/Comments:				
File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.				
Reviewer: Colin Walsh				
Phone: Division:				
Date: 3/28/12				



U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Biopesticides and Pollution Prevention Division (7511P) 1200 Pennsylvania Avenue NW Washington, DC 20460

85937-2

EPA Reg. Number:

Date of Issuance:

MAR 27 2012

Term of Issuance:

Unconditional

Name of Pesticide Product:

Bug Oil Food Use

NOTICE OF PESTICIDE:

X Registration Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Plant Impact plc

c/o

Exponent

1150 Connecticut Avenue NW

Suite 1100

Washington, DC 20036

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Biopesticides and Pollution Prevention Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This registration does not eliminate the need for continual reassessment of the pesticide. If EPA determines at any time, that additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under section 3(c)(2)(B) of FIFRA. This product is unconditionally registered in accordance with FIFRA Sec. 3(c)(5) provided you:

- 1. Submit and/or cite all data required for registration of your product under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.
- 2. Revise the EPA Registration Number to read, "EPA Reg. No. 85937-2".
- 3. Submit within 1 year after the Date of Registration acceptable data packages for Guideline Studies: Storage Stability study (OPPTS GLN: 830.6317) and Corrosion Characteristics study (OPPTS GLN: 830.6320) for this product.
- 4. Submit two (2) copies of the final printed labeling before you release the product for shipment.

A stamped copy of the label is enclosed for your records.

Signature of Approving Official:

Date:

MAR 27 2012

Michael

W. Michael McDavit, Associate Director. Biopesticides and Pollution Prevention Division

EPA Form 8570-6

Bug Oil Food Use [Master Label]

Bug Oil Food Use Commercial [Sub-Label A]

For Indoor and Outdoor Use as an insecticide/acaricide for the control of mites, whiteflies, aphids, thrips, mealybugs, scales and psylla [on all food crops].

ACTIVE INGREDIENTS:	
Canola Oil	93.899%
Tagetes Oil	0.6%
Thyme Oil	0.6%
Wintergreen Oil	
OTHER INGREDIENTS:	4.9%
TOTAL	
EPA Reg. No. 85937 – E	EPA Est. No.:

KEEP OUT OF REACH OF CHILDREN

[Refer to [Back][Side][Other] panel for Precautionary Statements]

Net Contents: X gallon(s) [X litre(s)]

Manufactured by:

Plant Impact
12 South Preston Office Village
Cuerden Way
Preston
UK
PR5 6BL
Tel: + 44 (0) 1772 628328

[] Denotes optional language.

ACCEPTED

3-27-12

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 85937-2

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Prolonged or frequently repeated skin contact with the concentrated product may cause allergic reactions in some individuals.

ENVIRONMENTAL HAZARDS

For terrestrial uses: Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling.

For any requirements specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation [Read [all other safety precautions and directions for use][entire label] prior to use.]

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Shoes plus socks
- · Waterproof gloves

Follow manufacturer's instructions for cleaning/maintaining personal protective equipment (PPE). If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash
 thoroughly and change into clean clothing.

AGRICULTURAL USE REQUIREMENTS

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 4 hours.

PPE required for early entry to treated areas (that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water), is:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Waterproof gloves

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, and greenhouses.

Keep children and pets off treated areas until dry.

Application Timing and Dose Rates

For all food crop plants and listed pests, apply Bug Oil at the rate of a 1% or 2% spray solution. See application instructions for more information. For a 1% spray solution, apply up to a maximum of 260 gallons of spray solution per acre (equivalent to no more than 2.6 gallons of Bug Oil per acre). For a 2% spray solution, apply up to a maximum of 260 gallons of spray solution per acre (equivalent to no more than 5.2 gallons of Bug Oil per acre). Apply as soon as pests appear on the plant. If required repeat applications every 5-7 days to ensure that each new generation that appears is treated.

Mixing

Shake the container of Bug Oil thoroughly before opening. Fill the spray tank with approximately half the required amount of water. Accurately measure the correct amount of Bug Oil and add this to the spray tank, agitating the mixture continuously. Add the remainder of the water to tank to make up to a 1% spray solution, 1.3 fluid ounces Bug Oil per gallon water (equivalent to no more than 2.6 gallons of Bug Oil per acre) or a 2% spray solution, 2.6 fluid ounces Bug Oil per gallon water (equivalent to no more than 5.2 gallons of Bug Oil per acre). Keep the solution agitated during spraying and use immediately. Avoid leaving spray liquid in the sprayer for long periods such as during meal times and overnight.

FILL THE TANK HALF FULL THEN ADD PRODUCTS IN THIS ORDER:

- 1. Dry flowables (DF)
- 2. Wettable powders (WP) and Wettable dry granules (WDG)
- 3. Flowables (F and SC)
- Foliar fertilizers
- 5. Then any products containing oils of any kind including Emulsifiable concentrates (EC)

Spray Application

Choose a nozzle that produces a fine spray quality and apply the product to give thorough coverage of the plant foliage, ensuring both the upper and lower surfaces of the leaves are covered. Do not spray more than required and ensure spray run-off is avoided. A minimum of 22 gallons of spray solution per acre should be applied.

[Cleaning Spray Equipment

Ensure all spray equipment is thoroughly cleaned after use. Use of water and detergent will be sufficient. Dispose of washings according to local regulations.]

[Crop Safety

Bug Oil has been tested on tomatoes and a range of plant species. However, before using Bug Oil on any new plant species or varieties, it is recommended that a small area is sprayed first to assess crop safety. Any mixtures with other products need to be tested prior to large scale use, to ensure physical compatibility and crop safety.

Tomato crops can be sprayed when in flower but suitable precautions should be taken to minimize the risk of crop damage by spraying in the morning or evening when temperatures are lower.]

USE SITES

Bug Oil is used to control mites, whiteflies, aphids, thrips, mealybugs, scales and psylla [on all food crops]. [Please see Appendix I for all food crops.][Some or all crops may be included on product label.] [Bug Oil can be used on [insert specific crops from Appendix I].]

Pre-harvest interval: This product can be applied up to and including the day of harvest.

Application Instructions

		Maximum Singl	e Applicati	on Rate	
	1% Spray Solution		2% Spray Solution		
Pest	fl. oz. / gallon of water	gallons Bug Oil / acre	fl. oz. / gallon of water	gallons Bug Oil / acre	Notes
Whiteflies Trialeurodes vaporariorum Bemisia tabaci Bemisia argentifolii	1.3	2.6	2.6	5.2	Apply 1 % spray solution at the onset of the pest entering the crop. Increase the rate to 2% spray solution under conditions of high pest pressure or in indoor crops when multiplication of the pest is rapid.
Mites Tetranychus spp. Panonychus spp.	1.3	2.6	N/A	N/A	
Aphids Aphis gossypii Myzus persicae Aphis spp.	1.3	2.6	2.6	5.2	Apply 1 % spray solution at the onset of the pest entering the crop. Increase the rate to 2% spray solution under conditions of high pest pressure or in indoor crops when multiplication of the pest is rapid.
Thrips Fraklinellia spp.	N/A	N/A	2.6	5.2	
Mealybugs	1.3	2.6	N/A	N/A	
Scales	1.3	2.6	N/A	N/A	
Psylla spp.	1.3	2.6	N/A	N/A	

Apply no more than 260 gallons of water per acre. Apply to ensure thorough coverage of plants and pests. A minimum rate of 22 gallons per acre is recommended.

Resistance: The mode of action includes a physical element and resistance is less likely to arise with Bug Oil than with pesticides relying on chemical effects alone.

[COMPATIBILITY

Bug Oil may be tank-mixed with a variety of plant protection products and foliar nutrient sprays providing that the application timing is correct for both Bug Oil and the partner(s) in the mixture.

The products should be added separately to the bulk of water in the spray tank. Continuous agitation should be maintained and the product used immediately after mixing.

For further information on the approval status of mixture partners, consult Plant Impact.

If a tank-mix with another product is required, add the Bug Oil to the spray tank first and ensure that it is fully dispersed before adding subsequent products. PLEASE SEE THE MIXING SCHEDULE ABOVE.

Ensure that the label recommendations are followed for the partner product.]

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE

Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

PESTICIDE DISPOSAL

Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING

Nonrefillable container. Do not reuse or refill this container.

Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill or by incineration or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[NOTICE TO BUYER]

[Note: Plant Impact warrants that this product complies with the specifications expressed in this label. To the extent consistent with applicable law, Plant Impact makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, Plant Impact's liability or default, breach or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Plant Impact shall have no liability for consequential damages.]

[Warranty and Disclaimer Statement]

[The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Such risks may arise from weather conditions, soil factors, off-target movement, unconventional farming techniques, the presence of other materials, the manner of use or application, or other unknown factors, all of which are beyond the control of Plant Impact, and can cause crop injury, injury to non-target crops or plants, ineffectiveness of the product, or other unintended consequences. To the extent consistent with applicable law, all such risks shall be assumed by the user or buyer.

Plant Impact warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. This warranty does not extend to the use of this product contrary to label instructions or under conditions not reasonably foreseeable to Plant Impact, and is subject to the inherent risks described above.

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Manufactured by:

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Preston
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PR5 6BL
Tel: + 44 (0) 1772 773774
[Batch code]

Bug Oil Food Use Residential [Sub-Label B]

For Indoor and Outdoor Use as an insecticide/acaricide for the control of mites, whiteflies, aphids, thrips, mealybugs, scales and psylla [on all food crops].

ACTIVE INGREDIENTS:	
Canola Oil	93.899%
Tagetes Oil	0.6%
Thyme Oil	0.6%
Wintergreen Oil	0.001%
OTHER INGREDIENTS:	
TOTAL	100.000%
EPA Reg. No. 85937 – E	EPA Est. No.:

KEEP OUT OF REACH OF CHILDREN

[Refer to [Back][Side][Other] panel for Precautionary Statements]

Net Contents: X gallon(s) [X litre]

Manufactured by:

Plant Impact 12 South Preston Office Village Cuerden Way Preston UK PR5 6BL Tel: + 44 (0) 1772 628328

[] Denotes optional language.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Prolonged or frequently repeated skin contact with the concentrated product may cause allergic reactions in some individuals.

ENVIRONMENTAL HAZARDS

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling.

For any requirements specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation [Read [all other safety precautions and directions for use][entire label] prior to use.]
Keep children and pets off treated areas until dry.

Application Timing and Rates

For all food crop plants and listed pests, apply Bug Oil at the rate of a 1% or 2% spray solution. See application instructions for more information. For a 1% spray solution, apply up to a maximum of 6 gallons of spray solution per 1000 square feet (equivalent to no more than 7.7 fluid ounces of Bug Oil per 1000 square feet). For a 2% spray solution, apply up to a maximum of 6 gallons of spray solution per 1000 square feet (equivalent to no more than 15.4 fluid ounces of Bug Oil per 1000 square feet). Apply as soon as pests appear in the plant. If required repeat applications every 5-7 days to ensure that each new generation that appears is treated.

Mixing

Shake the container of Bug Oil thoroughly before opening. Fill the spray tank with approximately half the required amount of water. Accurately measure the correct amount of Bug Oil and add this to the spray tank, agitating the mixture continuously. Add the remainder of the water to tank to make up to a 1% spray solution, 1.3 fluid ounces Bug Oil per gallon water (equivalent to no more than 7.7 fluid ounces of Bug Oil per 1000 square feet) or a 2% spray solution, 2.6 fluid ounces Bug Oil per gallon water (equivalent to no more than 15.4 fluid ounces of Bug Oil per 1000 square feet). Keep the solution agitated during spraying and use immediately. Avoid leaving spray liquid in the sprayer for long periods such as during meal times and overnight.

FILL THE TANK HALF FULL THEN ADD PRODUCTS IN THIS ORDER:

- 1. Dry flowables (DF)
- 2. Wettable powders (WP) and Wettable dry granules (WDG)
- 3. Flowables (F and SC)
- 4. Foliar fertilizers
- 5. Then any products containing oils of any kind including emulsifiable concentrates (EC)

[Cleaning Spray Equipment

Ensure all spray equipment is thoroughly cleaned after use. Use of water and detergent will be sufficient. Dispose of washings according to local regulations.

[Crop Safety

Bug Oil has been tested on tomatoes and a range of plant species. However, before using Bug Oil on any new plant species or varieties, it is recommended that a small area is sprayed first to assess crop safety. Any mixtures with other products need to be tested prior to large scale use, to ensure physical compatibility and crop safety.

Tomato crops can be sprayed when in flower but suitable precautions should be taken to minimize the risk of crop damage by spraying in the morning or evening when temperatures are lower.]

USE SITES

Bug Oil is used to control mites, whiteflies, aphids, thrips, mealybugs, scales and psylla [on all food crops]. [Please see Appendix I for all food crops.][Some or all crops may be included on product label.] [Bug Oil can be used on [insert specific crops from Appendix I].]

Pre-harvest interval: This product can be applied up to and including the day of harvest.

Application Instructions

		Maximum Singl	e Applicati	on Rate	
	1% Spray Solution		2% Spray Solution		
Pest	fl. oz. / gallon of water	gallons Bug Oil / acre	fl. oz. / gallon of water	gallons Bug Oil / acre	Notes
Whiteflies Trialeurodes vaporariorum Bemisia tabaci Bemisia argentifolii	1.3	2.6	2.6	5.2	Apply 1 % spray solution at the onset of the pest entering the crop. Increase the rate to 2% spray solution under conditions of high pest pressure or in indoor crops when multiplication of the pest is rapid.
Mites Tetranychus spp. Panonychus spp.	1.3	2.6	N/A	N/A	
Aphids Aphis gossypii Myzus persicae Aphis spp.	1.3	2.6	2.6	5.2	Apply 1 % spray solution at the onset of the pest entering the crop. Increase the rate to 2% spray solution under conditions of high pest pressure or in indoor crops when multiplication of the pest is rapid.
Thrips Fraklinellia spp.	N/A	N/A	2.6	5.2	
Mealybugs	1.3	2.6	N/A	N/A	
Scales	1.3	2.6	N/A	N/A	
Psylla spp.	1.3	2.6	N/A	N/A	

Apply to ensure thorough coverage of plants and pests.

Resistance: The mode of action includes a physical element and resistance is less likely to arise with Bug Oil than with pesticides relying on chemical effects alone.

COMPATIBILITY

Bug Oil may be tank-mixed with a variety of plant protection products and foliar nutrient sprays providing that the application timing is correct for both Bug Oil and the partner(s) in the mixture.

The products should be added separately to the bulk of water in the spray tank. Continuous agitation should be maintained and the product used immediately after mixing.

For further information on the approval status of mixture partners, consult Plant Impact.

If a tank-mix with another product is required, add the Bug Oil to the spray tank first and ensure that it is fully dispersed before adding subsequent products. PLEASE SEE THE MIXING SCHEDULE ABOVE.

Ensure that the label recommendations are followed for the partner product.]

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

PESTICDE STORAGE

Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

PESTICIDE DISPOSAL

Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING

Nonrefillable container. Do not reuse or refill this container.

If empty: Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

[NOTICE TO BUYER]

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[Batch code]

APPENDIX I

COTTON

```
ROOT AND TUBER VEGETABLES - CROP GROUP 1
 Arracacha (Arracacia xanthorrhiza)
 Arrowroot (Maranta arundinacea)
 Artichoke, Chinese (Stachys affinis)
 Artichoke, Jerusalem (Helianthus tuberosus)
 Beet, garden (Beta vulgaris)
 Beet, sugar (Beta vulgaris)
 Burdock, edible (Arctium lappa)
 Canna, edible (Queensland arrowroot) ( Canna indica )
 Carrot ( Daucus carota )
 Cassava, bitter and sweet (Manihot esculenta)
 Celeriac (celery root) ( Apium graveolens var. rapaceum )
 Chayote (root) ( Sechium edule )
 Chervil, turnip-rooted ( Chaerophyllum bulbosum ).
 Chicory (Cichorium intybus)
 Chufa (Cyperus esculentus)
 Dasheen (taro) (Colocasia esculenta)
 Ginger (Zingiber officinale)
 Ginseng (Panax quinquefolius)
Horseradish (Armoracia rusticana)
 Leren (Calathea allouia)
Parsley, turnip-rooted ( Petroselinum crispum var. tuberosum )
Parsnip (Pastinaca sativa)
Potato (Solanum tuberosum)
 Radish (Raphanus sativus)
Radish, oriental (daikon) ( Raphanus sativus subvar. longipinnatus )
Rutabaga (Brassica campestris var. napobrassica)
Salsify (oyster plant) (Tragopogon porrifolius).
Salsify, black (Scorzonera hispanica)
Salsify, Spanish (Scolymus hispanicus)
Skirret (Sium sisarum)
Sweet potato ( Ipomoea batatas )
Tanier (cocoyam) ( Xanthosoma sagittifolium )
Turmeric (Curcuma longa)
Turnip (Brassica rapa var. rapa)
Yam bean (jicama, manoic pea) ( Pachyrhizus spp.)
Yam, true (Dioscorea spp.)
LEAVES OF ROOT AND TUBER VEGETABLES (HUMAN FOOD OR ANIMAL FEED) GROUP - COMMODITIES - CROP GROUP 2
Beet, garden (Beta vulgaris)
Beet, sugar ( Beta vulgaris )
Burdock, edible ( Arctium lappa )
Carrot ( Daucus carota )
Cassava, bitter and sweet ( Manihot esculenta )
Celeriac (celery root) ( Apium graveolens var. rapaceum )
Chervil, turnip-rooted ( Chaerophyllum bulbosum )
Chicory ( Cichorium intybus )
Dasheen (taro) ( Colocasia esculenta )
Parsnip (Pastinaca sativa)
Radish (Raphanus sativus)
Radish, oriental (daikon) ( Raphanus sativus subvar. longipinnatus )
Rutabaga ( Brassica campestris var. napobrassica )
Salsify, black ( Scorzonera hispanica )
Sweet potato ( Ipomoea batatas )
Tanier (cocoyam) ( Xanthosoma sagittifolium )
Turnip ( Brassica rapa var. rapa )
Yam, true ( Dioscorea spp.)
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Chive, fresh leaves (Allium schoenoprasum L .)

Daylily, bulb (Hemerocallis fulva (L.) L. var. fulva)

BULB VEGETABLES (Alliums spp.) GROUP - COMMODITIES - CROP GROUP 3

Chive, Chinese, fresh leaves (Allium tuberosum Rottler ex Spreng)

Elegans hosta (Hosta Sieboldiana (Hook.) Engl) Fritillaria, bulb (Fritillaria L. fritillary) Fritillaria, leaves (Fritillaria L. fritillary) Garlic, bulb (Allium sativum L, var. sativum) (A. sativum Common Garlic Group) Garlic, great headed, bulb (Allium ampeloprasum L. var. ampeloprasum) (A. ampeloprasum Great Headed Garlic Group) Garlic, Serpent, bulb (Allium sativum var. ophioscorodon or A. sativum Ophioscorodon Group) Kurrat (Allium kurrat Schweinf. Ex. K. Krause or A. ampeloprasum Kurrat Group) Lady's leek (Allium cemuum Roth) Leek Allium porrum L. (syn: A. ampeloprasum L. var. porrum (L.) J. Gay) (A. ampeloprasum Leek Group) Leek, wild (Allium tricoccum Aiton) Lily, bulb (Lilium spp. (Lilium Leichtlinii var. maximowiczii, Lilium lancifolium)) Onion, Beltsville bunching (Allium x proliferum (Moench) Schrad.) (syn: Allium fistulosum L. x A. cepa L.) Onion, bulb (Allium cepa L. var. cepa) (A. cepa Common Onion Group) Onion, Chinese, bulb (Allium chinense G. Don.) (syn: A. bakeri Regel) Onion, fresh (Allium fistulosum L. var. caespitosum Makino) Onion, green (Allium cepa L. var. cepa) (A. cepa Common Onion Group) Onion, macrostem (Allium macrostemom Bunge) Onion, pearl (Allium porrum var. sectivum or A. ampeloprasum Pearl Onion Group) Onion, potato, bulb (Allium cepa L. var. aggregatum G. Don.) (A. cepa Aggregatum Group) Onion, tree, tops (Allium x proliferum (Moench) Schrad. ex Willd.) (syn: A. cepa var. proliferum (Moench) Regel; A. cepa L. var. bulbiferum L.H. Bailey; A. cepa L. var. viviparum (Metz.) Alef.) Onion, Welsh, tops (Allium fistulosum L.) Shallot, bulb (Allium cepa var. aggregatum G. Don.) Shallot, fresh leaves (Allium cepa var. aggregatum G. Don.) Cultivars, varieties, and/or hybrids of these. LEAFY VEGETABLES (EXCEPT BRASSICA VEGETABLES) GROUP - CROP GROUP 4 Amaranth (leafy amaranth, Chinese spinach, tampala) (Amaranthus spp.) Arugula (Roquette) (Eruca sativa) Cardoon (Cynara cardunculus) Celery (Apium graveolens var. dulce) Celery, Chinese (Apium graveolens var. secalinum) Celtuce (Lactuca sativa var. angustana) Chervil (Anthriscus cerefolium) Chrysanthemum, edible-leaved (Chrysanthemum coronarium var. coronarium) Chrysanthemum, garland (Chrysanthemum coronarium var. spatiosum) Corn salad (Valerianella locusta) Cress, garden (Lepidium sativum) Cress, upland (yellow rocket, winter cress) (Barbarea vulgaris) Dandelion (Taraxacum officinale) Dock (sorrel) (Rumex spp.) Endive (escarole) (Cichorium endivia) Fennel, Florence (finochio) (Foeniculum vulgare Azoricum Group) Lettuce, head and leaf (Lactuca sativa) Orach (Atriplex hortensis) Parsley (Petroselinum crispum) Pursiane, garden (Portulaca oleracea) Purslane, winter (Montia perfoliata) Radicchio (red chicory) (Cichorium intybus) Rhubarb (Rheum rhabarbarum) Spinach (Spinacia oleracea) Spinach, New Zealand (Tetragonia tetragonioides, T. expansa) Spinach, vine (Malabar spinach, Indian spinach) (Basella alba) Swiss chard (Beta vulgaris var. cicla) BRASSICA (COLE) LEAFY VEGETABLES - CROP GROUP 5 Broccoli (Brassica oleracea var. botrytis) Broccoli, Chinese (gai lon) (Brassica alboglabra) Broccoli raab (rapini) (Brassica campestris) Brussels sprouts (Brassica oleracea var. gemmifera) Cabbage (Brassica oleracea) Cabbage, Chinese (bok choy) (Brassica chinensis) Cabbage, Chinese (napa) (Brassica pekinensis) Cabbage, Chinese mustard (gai choy) (Brassica campestris) Cauliflower (Brassica oleracea var. botrytis)

Cavalo broccolo (Brassica oleracea var. botrytis)
Collards (Brassica oleracea var. acephala)
Kale (Brassica oleracea var. acephala)
Kohlrabi (Brassica oleracea var. gongylodes)
Mizuna (Brassica rapa Japonica Group)

Mustard greens (Brassica juncea)

Mustard spinach (Brassica rapa Perviridis Group)

Rape greens (Brassica napus)

LEGUME VEGETABLES (SUCCULENT OR DRIED) - CROP GROUP 6

Bean (Lupinus spp.) (includes grain lupin, sweet lupin, white lupin, and white sweet lupin)

Bean (Phaseolus spp.) (includes field bean, kidney bean, lima bean, navy bean, pinto bean, runner bean, snap bean, tepary bean, wax bean)

Bean (Vigna spp.) (includes adzuki bean, asparagus bean, blackeyed pea, catjang, Chinese longbean, cowpea, Crowder pea, moth bean, mung bean, rice bean, southern pea, urd bean, yardlong bean)

Broad bean (fava bean) (Vicia faba)

Chickpea (garbanzo bean) (Cicer arietinum)

Guar (Cyamopsis tetragonoloba)

Jackbean (Canavalia ensiformis)

Lablab bean (hyacinth bean) (Lablab purpureus)

Lentil (Lens esculenta)

Pea (*Pisum* spp.) (includes dwarf pea, edible-pod pea, English pea, field pea, garden pea, green pea, snow pea, sugar snap pea)

Pigeon pea (Cajanus cajan)

Soybean (Glycine max)

Soybean (immature seed) (Glycine max)

Sword bean (Canavalia gladiata)

FOLIAGE OF LEGUME VEGETABLES GROUP - CROP GROUP 7

Any cultivar of bean (Phaseolus spp.) and field pea (Pisum spp.), and soybean (Glycine max)

FRUITING VEGETABLES (EXCEPT CUCURBITS) - COMMODITIES - CROP GROUP 8

Eggplant (Solanum melongena)

Groundcherry (Physalis spp.)

Pepino (Solanum muricatum)

Pepper (Capsicum spp.) (includes bell pepper, chili pepper, cooking pepper, pimento, sweet pepper)

Tomatillo (Physalis ixocarpa)

Tomato (Lycopersicon esculentum)

CUCURBIT VEGETABLES - CROP GROUP 9

Chayote (fruit) (Sechium edule)

Chinese waxgourd (Chinese preserving melon) (Benincasa hispida)

Citron melon (Citrullus lanatus var. citroides)

Cucumber (Cucumis sativus)

Gherkin (Cucumis anguna)

Gourd, edible (Lagenaria spp.) (includes hyotan, cucuzza); (Luffa acutangula, L. cylindrica) (includes hechima, Chinese okra) Momordica spp. (includes balsam apple, balsam pear, bitter melon, Chinese cucumber)

Muskmelon (hybrids and/or cultivars of Cucumis melo) (includes true cantaloupe, cantaloupe, casaba, crenshaw melon, golden pershaw melon, honeydew melon, honey balls, mango melon, Persian melon, pineapple melon, Santa Claus melon, and snake melon) Pumpkin (Cucurbita spp.)

Squash, summer (Cucurbita pepo var. melopepo) (includes crookneck squash, scallop squash, straightneck squash, vegetable marrow, zucchini)

Squash, winter (Cucurbita maxima; C. moschata) (includes butternut squash, calabaza, hubbard squash); (C. mixta; C. pepo) (includes acorn squash, spaghetti squash)

Watermelon (includes hybrids and/or varieties of Citrullus lanatus)

CITRUS FRUITS (CITRUS spp., FORTUNELLA spp.) GROUP - COMMODITIES - CROP GROUP 10

Calamondin (Citrus mitis × Citrofortunella mitis)

Citrus citron (Citrus medica)

Citrus hybrids (Citrus spp.) (includes chironja, tangelo, tangor)

Grapefruit (Citrus paradisi)

Kumquat (Fortunella spp.)

Lemon (Citrus jambhiri, Citrus limon)

Lime (Citrus aurantiifolia)

Mandarin (tangerine) (Citrus reticulata)

Orange, sour (Citrus aurantium)

Orange, sweet (Citrus sinensis)

Pummelo (Citrus grandis, Citrus maxima)

Satsuma mandarin (Citrus unshiu)

POME FRUITS GROUP - COMMODITIES - CROP GROUP 11

Apple (Malus domestica)

Crabapple (Malus spp.)

Loguat (Eriobotrya japonica)

Mayhaw (Crataegus aestivalis, C. opaca, and C. rufula)

Pear (*Pyrus communis*) Pear, oriental (*Pyrus pyrifolia*) Quince (*Cydonia oblonga*)

STONE FRUITS GROUP - COMMODITIES - CROP GROUP 12

Apricot (Prunus armeniaca) Cherry, sweet (Prunus avium), Cherry, tart (Prunus cerasus) Nectarine (Prunus persica) Peach (Prunus persica)

Plum (Prunus domestica, Prunus spp.)

Plum, Chickasaw (Prunus angustifolia)

Plum, Damson (Prunus domestica spp. insititia)

Plum, Japanese (Prunus salicina)

Plumcot (Prunus. armeniaca × P. domestica)

Prune (fresh) (Prunus domestica, Prunus spp.)

BERRIES GROUP - CROP GROUP 13

Blackberry (*Rubus eubatus*) (including bingleberry, black satin berry, boysenberry, Cherokee blackberry, Chesterberry, Cheyenne blackberry, coryberry, darrowberry, dewberry, Dirksen thornless berry, Himalayaberry, hullberry, Lavacaberry, lowberry, Lucretiaberry, mammoth blackberry, marionberry, nectarberry, olallieberry, Oregon evergreen berry, phenomenalberry, rangeberry, ravenberry, rossberry, Shawnee blackberry, youngberry, and varieties and/or hybrids of these)

Blueberry (Vaccinium spp.)

Currant (Ribes spp.)

Elderberry (Sambucus spp.)

Gooseberry (Ribes spp.)

Huckleberry (Gaylussacia spp.)

Loganberry (Rubus loganobaccus)

Raspberry, black and red (Rubus occidentalis, Rubus strigosus, Rubus idaeus)

BERRY AND SMALL FRUIT CROP GROUP -- CROP GROUP 13-07

Amur river grape (Vitis amurensis Rupr)

Aronia berry (Aronia spp.)

Bayberry (Myrica spp.)

Bearberry (Arctostaphylos uva-ursi)

Bilberry (Vaccinium myrtillus L.)

Blackberry (*Rubus* spp.) (including Andean blackberry, arctic blackberry, bingleberry, black satin berry, boysenberry, brombeere, California blackberry, Chesterberry, Cherokee blackberry, Cheyenne blackberry, common blackberry, coryberry, darrowberry, dewberry, Dirksen thornless berry, evergreen blackberry, Himalayaberry, hullberry, lavacaberry, loganberry, lowberry, Lucretiaberry, mammoth blackberry, marionberry, mora, mures deronce, nectarberry, Northern dewberry, olallieberry, Oregon evergreen berry, phenomenalberry, rangeberry, ravenberry, rossberry, Shawnee blackberry, Southern dewberry, tayberry, youngberry, zarzamora, and cultivars, varieties and/or hybrids of these.)

Blueberry, highbush (Vaccinium spp.)

Blueberry, lowbush (Vaccinium angustifolium Aiton)

Buffalo currant (Ribes aureum Pursh)

Buffaloberry (Shepherdia argentea (Pursh) Nutt.)

Che (Cudrania tricuspidata Bur. Ex Lavallee)

Chilean guava (Myrtus ugni Mol.)

Chokecherry (Prunus virginiana L.)

Cloudberry (Rubus chamaemorus L.)

Cranberry (Vaccinium macrocarpon Aiton)

Currant, black (Ribes nigrum L.)

Currant, red (Ribes rubrum L.)

Elderberry (Sambucus spp.)

European barberry (Berberis vulgaris L.)

Gooseberry (Ribes spp.)

Grape (Vitis spp.)

Highbush cranberry (Vibumum opulus L. var. Americanum Aiton)

Honeysuckle, edible (Lonicera caerula L . var. emphyllocalyx Nakai, Lonicera caerula L var . edulis Turcz. ex herder)

Huckleberry (Gaylussacia spp.)

Jostaberry (Ribes x nidigrolaria Rud. Bauer and A. Bauer)

Juneberry (Saskatoon berry) (Amelanchier spp.)

Kiwifruit, fuzzy (Actinidia deliciosa A. Chev.) (C.F. Liang and A.R. Fergusons, Actinida chinensis Planch.)

Kiwifruit, hardy (Actinidia arguta (Siebold and Zucc.) Planch. ex Miq)

Lingonberry (Vaccinium vitis-idaea L.)

Maypop (Passiflora incamata L.)

Mountain pepper berries (Tasmannia lanceolata)(Poir.) A.C.Sm.

Mulberry (Morus spp.)

Muntries (Kunzea pomifera F. Muell.)

Native currant (Acrotriche depressa R. BR.)
Partridgeberry (Mitchella repens L.)
Phalsa (Grewia subinaequalis DC.)
Pincherry (Prunus pensylvanica L.f.)
Raspberry, black and red (Rubus spp.)
Riberry (Syzygium luehmannii)
Salal (Gaultheria shallon Pursh.)
Schisandra berry (Schisandra chinensis (Turcz.) Baill.)
Sea buckthorn (Hippophae rhamnoides L.)
Serviceberry (Sorbus spp.)
Strawberry (Fragaria x ananassa Duchesne)
Wild raspberry (Rubus muelleri Lefevre ex P.J. Mull)
Cultivars, varieties, and/or hybrids of these.

TREE NUTS - COMMODITIES - CROP GROUP 14

Almond (Prunus dulcis)
Beech nut (Fagus spp.)
Brazil nut (Bertholletia excelsa)
Butternut (Juglans cinerea)
Cashew (Anacardium occidentale)
Chestnut (Castanea spp.)
Chinquapin (Castanea pumila)
Filbert (hazelnut) (Corylus spp.)
Hickory nut (Carya spp.)
Macadamia nut (bush nut) (Macadamia spp.)
Pecan (Carya illinoensis)
Walnut, black and English (Persian) (Juglans spp.)

CEREAL GRAINS - COMMODITIES - CROP GROUP 15

Barley (Hordeum spp.)
Buckwheat (Fagopyrum esculentum)
Corn (Zea mays)
Millet, pearl (Pennisetum glaucum)
Millet, proso (Panicum milliaceum)
Oats (Avena spp.)
Popcorn (Zea mays var. everta)
Rice (Oryza sativa)
Rye (Secale cereale)
Sorghum (milo) (Sorghum spp.)
Teosinte (Euchlaena mexicana)
Triticale (Triticum-Secale hybrids)
Wheat (Triticum spp.)
Wild rice (Zizania aquatica)

FORAGE, FODDER AND STRAW OF CEREAL GRAINS GROUP - CROP GROUP 16

Forage, fodder, and straw of all commodities included in the group cereal grains group.

GRASS FORAGE, FODDER, AND HAY GROUP - CROP GROUP 17

Any grass, *Gramineae* family (either green or cured) except sugarcane and those included in the cereal grains group, that will be fed to or grazed by livestock, all pasture and range grasses and grasses grown for hay or silage.

NONGRASS ANIMAL FEEDS (FORAGE, FODDER, STRAW, AND HAY) GROUP - CROP GROUP 18

Alfalfa (Medicago sativa subsp. sativa)
Bean, velvet (Mucuna pruriens var. utilis)
Clover (Trifolium spp., Melilotus spp.)
Kudzu (Pueraria lobata)
Lespedeza (Lespedeza spp.)
Lupin (Lupinus spp.)
Sainfoin (Onobrychis viciifolia);
Trefoil (Lotus spp.)
Vetch (Vicia spp.)
Vetch, crown (Coronilla varia)
Vetch, milk (Astragalus spp).

HERBS AND SPICES GROUP - CROP GROUP 19

Allspice (*Pimenta dioica*) Angelica (*Angelica archangelica*) Anise (anise seed) (*Pimpinella anisum*) Anise, star (*Illicium verum*)

Annatto (seed) Balm (lemon balm) (Melissa officinalis) Basil (Ocimum basilicum) Borage (Borago officinalis) Burnet (Sanguisorba minor) Camomile (Anthemis nobilis) Caper buds (Capparis spinosa) Caraway (Carum carvi) Caraway, black (Nigella sativa) Cardamom (Elettaria cardamomum) Cassia bark (Cinnamomum aromaticum) Cassia buds (Cinnamomum aromaticum) Catnip (Nepeta cataria) Celery seed (Apicum graveolens) Chervil (dried) (Anthriscus cerefolium) Chive (Allium schoenoprasum) Chive, Chinese (Allium tuberosum) Cinnamon (Cinnamomum verum) Clary (Salvia sclarea) Clove buds (Eugenia caryophyllata) Coriander (cilantro or Chinese parsley) (leaf) (Coriandrum sativum) Coriander (cilantro) (seed) (Coriandrum sativum) Costmary (Chrysanthemum balsamita) Culantro (leaf) (Eryngium foetidum) Culantro (seed) (Eryngium foetidum) Cumin (Cuminum cyminum) Curry (leaf) (Murraya koenigii) Dill (dillweed) (Anethum graveolens) Dill (seed) (Anethum graveolens) Fennel (common) (Foeniculum vulgare) Fennel, Florence (seed) (Foeniculum vulgare Azoricum Group) Fenugreek (Trigonella foenumgraecum) Grains of paradise (Aframomum melegueta) Horehound (Marrubium vulgare) Hyssop (Hyssopus officinalis) Juniper berry (Juniperus communis) Lavender (Lavandula officinalis) Lemongrass (Cymbopogon citratus) Lovage (leaf) (Levisticum officinale) Lovage (seed) (Levisticum officinale) Mace (Myristica fragrans) Marigold (Calendula officinalis) Marjoram (Origanum spp.) (includes sweet or annual marjoram, wild marjoram or oregano, and pot marjoram) Mustard (seed) (Brassica juncea, B. hirta, B. nigra) Nasturtium (Tropaeolum majus) Nutmeg (Myristica fragrans) Parsley (dried) (Petroselinum crispum) Pennyroyal (Mentha pulegium) Pepper, black (Piper nigrum) Pepper, white Poppy (seed) (Papaver somniferum) Rosemary (Rosemarinus officinalis) Rue (Ruta graveolens) Saffron (Crocus sativus) Sage (Salvia officinalis) Savory, summer and winter (Satureja spp.) Sweet bay (bay leaf) (Laurus nobilis) Tansy (Tanacetum vulgare) Tarragon (Artemisia dracunculus) Thyme (Thymus spp.) Vanilla (Vanilla planifolia) Wintergreen (Gaultheria procumbens) Woodruff (Galium odorata) Wormwood (Artemisia absinthium)

EDIBLE FUNGI GROUP - COMMODITIES - CROP GROUP 21

Blewitt (Lepista nuda)

Bunashimeji (Hypsizygus marmoreus)

Chinese mushroom (Volvariella volvacea) (Bull.) Singer

Enoki (Flammulina velutipes) (Curt.) Singe. Hime-Matsutake (Agaricus blazei) Murill Hirmeola (Auricularia auricular) Maitake (Grifola frondosa) Morel (Morchella spp.) Nameko (Pholiota nameko) Net Bearing (Dictyophora) Oyster mushroom (Pleurotus spp.) Pom Pom (Hericium erinaceus) Reishi mushroom (Ganoderma lucidum (Leyss. Fr.) Karst.) Rodman's agaricus (Agaricus bitorquis) (Quel.) Saccardo Shiitake mushroom (Lentinula edodes (Berk.) Pegl.) Shimeji (Tricholoma conglobatum) Stropharia (Stropharia spp.) Truffle (Tuber spp.) White button mushroom (Agaricus bisporous (Lange) Imbach) White Jelly Fungi (Tremella fuciformis)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Washington, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

MEMORANDUM

SUBJECT: Consideration of a Section 3(c)(5) Unconditional Registration for the New Active

Ingredient, Tagetes Oil (PC Code 176602).

-----DECISION MEMORANDUM-----

FROM:

Keith A. Matthews, Director 22 Mars 2013

Biopesticides and Pollution Prevention Division

TO:

Steven Bradbury, Ph.D., Director

Office of Pesticide Programs

I. ISSUE

Should the Agency, under Section 3(c)(5) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), grant an unconditional registration for the new biochemical active ingredient. tagetes oil (PC Code 176602), which is proposed for use as an insecticide/acaricide for the control of mites, whiteflies, aphids, thrips, mealybugs, scales, and psylla on a variety of food and non-food crops.

II. APPLICATION INFORMATION

On September 18, 2009, Exponent on behalf of Plant Impact plc, submitted an application for registration of the end-use products (EPs), Bug Oil Food Use (EPA File Symbol No. 85937-E) and Bug Oil Ornamental (EPA File Symbol No. 85937-R), containing the new biochemical active ingredient, tagetes oil, and the currently registered active ingredients, canola oil, thyme oil, and wintergreen oil. A notice of receipt (NOR) of this application, allowing for a 30-day comment period, was published in the Federal Register on December 16, 2009 (74 FR 66639). No comments were received following this publication. In addition, the applicant filed a petition (PP 9F7619) proposing to establish an exemption from the requirement of a tolerance for residues of tagetes oil in or on all food commodities. A notice of filing (NOF), allowing for a 30day comment period, was published in the Federal Register on December 16, 2009 (74 FR 66644). No comments were received following this publication. The Agency determined during the review of the petition that the active ingredient, tagetes oil, is an edible oil and is exempt from the requirement of a tolerance as a minimal risk active ingredient under 40 CFR 180.950(c). Therefore, the petition (PP 9F7619) filed by the applicant is no longer applicable, nor needed, for this new active ingredient, tagetes oil, and has been withdrawn by the Agency.

III. BACKGROUND AND CONCLUSIONS

The Biopesticides and Pollution Prevention Division (BPPD) reviewed the submitted data and information regarding the proposed use of tagetes oil. Evaluations of the data and conclusions are summarized and discussed in the attached Biopesticide Registration Action Document (BRAD).

BPPD has assessed the registration applications for Bug Oil Food Use and Bug Oil Ornamental pursuant to the requirements of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and the Federal Food, Drug, and Cosmetic Act (FFDCA), and determined that, if used in accordance with label directions, (1) no unreasonable adverse effects to the environment will result from the use of these products, and (2) there is a reasonable certainty that no harm will result from exposure to residues of tagetes oil. Tagetes oil is extracted from the flowering herb, Tagetes minuta (Muster John Henry or Mexican Marigold). The major constituents of the identified components of tagetes oil are terpenes, which are found in a variety of essential oils. The mode of action is repellency by tagetes oil alone and suffocation by tagetes oil in conjunction with the other actives in the proposed EPs, canola oil, thyme oil, and wintergreen oil. Based on the Agency's risk assessment, BPPD has determined that registration of Bug Oil Food Use and Bug Oil Ornamental will not cause harm to humans and will not cause unreasonable adverse effects to the environment. Tagetes oil is exempt from the requirement of a tolerance as a minimal risk active ingredient under 40 CFR 180.950(c).

The data and information submitted by the applicant and reviewed by BPPD support the registration of the EPs, Bug Oil Food Use and Bug Oil Ornamental, containing the active ingredients, canola oil, tagetes oil, thyme oil, and wintergreen oil, at 93.899%, 0.6%, 0.6%, and 0.001%, respectively, when applied/used as directed on their labels and in accordance with good agricultural practices.

Tagetes oil is a new active ingredient, not present in any currently registered pesticide product. Therefore, it is subject to the Office of Pesticide Programs' (OPP) public participation process for certain registration actions. The notice announcing the start of this 30-day comment period was posted on February 21, 2012, to the public participation website and in docket ID EPA-HQ-OPP-2009-0822. Also posted to the docket were the draft Biopesticides Registration Action Document (BRAD) and draft product labels for Bug Oil Food Use and Bug Oil Ornamental. There were no comments received in support of the registration of tagetes oil.

IV. OFFICE DIRECTOR CONCURRENCE

Based on the discussion above, and the data summarized in the attached BRAD, BPPD recommends unconditional registration of the biochemical, tagetes oil (PC Code 176602), as a new active ingredient for use as a insecticide/acaricide for the control of mites, whiteflies, aphids, thrips, mealybugs, scales, and psylla on a variety of food crops.

Concurrence:
Non-Concurrence:
Date: $\frac{3}{23}/2$

Tagetes Oil (176602) Fact Sheet

Summary

Tagetes oil is a biochemical pesticide active ingredient intended for use as an insecticide/acaricide for the control of mites, whiteflies, aphids, thrips, mealybugs, scales, and pyslla on a variety of food and non-food crops. The active ingredient is extracted from the flowering herb, *Tagetes minuta* (Muster John Henry or Mexican Marigold). The major constituents of the identified components of tagetes oil are terpenes, which are found in a variety of essential oils. The use of tagetes oil as an insecticide/acaricide is not expected to cause any unreasonable adverse effects to human health or the environment.

I. Description of the Active Ingredient

Tagetes oil is extracted from the flowering herb, *Tagetes minuta* (Muster John Henry or Mexican Marigold). The major constituents of the identified components of tagetes oil are terpenes, which are found in a variety of essential oils. Tagetes oil, as *Tagetes patula L.*, *T. erecta L.*, or *T. minuta L.* (*T. glandulifera* Schrank), is approved by the U.S. Food and Drug Administration (FDA) for use in food as a natural flavoring substance and natural adjuvant (in the oil form only) under 21 CFR 172.510. Tagetes oil is also used in some cosmetics including shampoos, soaps and lotions.

II. Use Sites, Target Pests, and Application Methods

Use Sites: A variety of food and non-food crops

Target Pests: Mites, whiteflies, aphids, thrips, mealybugs, scales, and pyslla

Application Methods: Spray application

III. Assessing Risks to Human Health

Review of the required toxicity testing data concludes that tagetes oil does not exhibit any toxicity to humans except through dermal exposure, in which case tagetes oil demonstrated some acute toxicity and is moderately irritating to the skin. There have been no reports of hypersensitivity incidents. Based on this information, no human health risks are expected when pesticide products containing tagetes oil are used according to their respective label directions.

IV. Assessing Risks to the Environment

The product is a contact insecticide/acaricide that operates through a physical mode of action. The product is practically nontoxic to birds, fish and aquatic invertebrates and is not phytotoxic; toxic endpoints have not been identified for these species. The product is practically nontoxic via exposure through contact to nontarget insects. Based on the data submitted, the Agency has indicated in its review that the product may be moderately toxic via oral exposure to nontarget insects; however, no mortality was observed at the highest dose tested in the study. Additionally, significant oral exposure is not anticipated as the product is a contact insecticide and is expected to degrade rapidly in the environment. Toxic endpoints have not

been identified for nontarget insects via the oral or contact route of exposure. The results of the submitted studies and screening-level risk assessment indicate that use of the product according to label instructions should not result in adverse effects to birds, fish, aquatic invertebrates, plants or nontarget insects.

V. Regulatory Information

This is the first registration of a product containing the new active ingredient, tagetes oil. On September 18, 2009, the Agency received an application from Exponent on behalf of Plant Impact plc, to register the end-use products (EPs), Bug Oil Food Use (EPA File Symbol No. 85937-E) and Bug Oil Ornamental (EPA File Symbol No. 85937-R), containing the new biochemical active ingredient, tagetes oil, and the currently registered active ingredients, canola oil, thyme oil, and wintergreen oil under the provisions of section 3 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). On December 16, 2009, the Agency announced receipt of this application to register a pesticide product containing a new active ingredient (74 FR 66639) and opened a 30-day comment period pursuant to the provisions of FIFRA section 3(c)(4). No comments were received following this publication.

VI. Applicant Information

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VII. Additional Contact Information

Ombudsman
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Environmental Protection Agency
1200 Pennsylvania Avenue, NW
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